#### **VOLUME 20 (PX56B – PX239)**

No. 24-13590

## United States Court of Appeals for the Eleventh Circuit

#### DELTONA TRANSFORMER CORPORATION,

*Plaintiff-Appellee*,

V.

#### THE NOCO COMPANY,

Defendant-Appellant.

On Appeal from the United States District Court for the Middle District of Florida, Hon. Carlos E. Mendoza, Case No. 6:19-cv-00308-CEM-LHP

#### NON-CONFIDENTIAL APPENDIX OF DEFENDANT-APPELLANT THE NOCO COMPANY

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U.S. District Court
Middle District of Florida

PLAINTIFF'S EXHIBIT

Exhibit Number: PX-056B

Case Number:

6:19-ev-00308-CEM-LRH

Deltona Transformer Corporation

V.

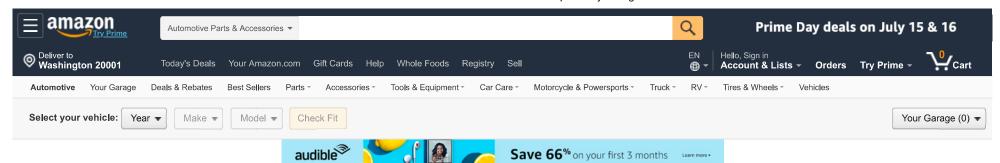
The Noco Company

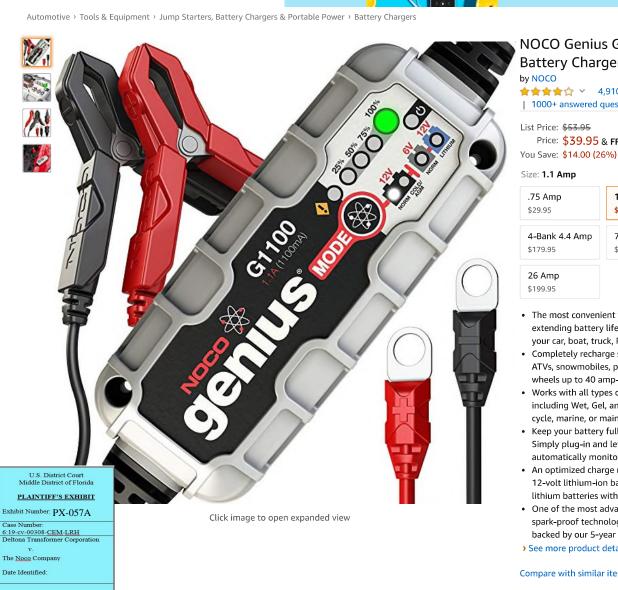
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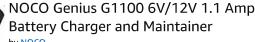
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Date Admitted







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- · Works with all types of 6-volt and 12-volt lead-acid batteries, including Wet, Gel, and AGM, or any common automotive, deepcycle, marine, or maintenance-free battery.
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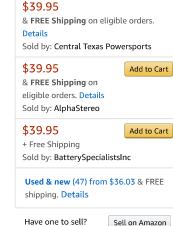


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NOCO GC002 X-Connect Eyelet Terminal

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Battery Tender Plus 021-0128, 1.25 Amp Battery Charger is a Smart Charger, it will Fully Charge and Maintain a Battery at Proper Storage Voltage without the Damaging Effects Caused by Trickle Chargers

**★★★★4**,933 \$45.03**√prime** 



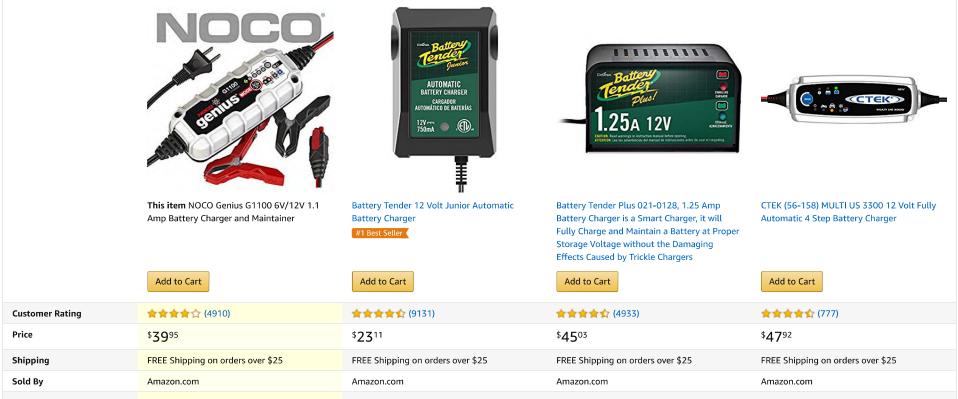
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 Item Dimensions
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 8 x 4 x 9 in
 11 x 4 x 11 in
 6.5 x 2 x 1.5 in

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Size: 1.1 Amp

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#### **Product information**

Size:1.1 Amp

#### **Technical Details**

Brand	NOCO
Model	G1100
Item Weight	1.56 pounds
Product Dimensions	10.5 x 10 x 4 inches
California residents	Click here for Proposition 65 warning
Item model number	G1100
Manufacturer Part Number	G1100
OEM Part Number	G1100
ABPA Partslink Number	13
Folding	No
Cover Included	G1100 Advanced Battery Trickle Charger Maintainer, Battery Clamps with Integrated Eyelet Terminals, User Guide, 5-Year Limited Warranty
Amperage	1.1 A
Voltage	12 volts

#### **Technical Specification**

Specification Sheet [pdf]
User Manual [pdf]

#### Additional Information

ASIN	B004LX3AXQ
Customer Reviews	★★★★☆ ✓ 4,910 customer reviews 4.2 out of 5 stars
Best Sellers Rank	#1,474 in Automotive (See Top 100 in Automotive) #20 in Battery Chargers #306 in Automotive Replacement Parts
Shipping Weight	1.63 pounds (View shipping rates and policies)
Date First Available	July 7, 2004

#### Warranty & Support

Warranty, Parts: Parts

For warranty information about this product, please click here [PDF]

#### Feedback

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#### **Important information**

#### Legal Disclaimer

CALIFORNIA WARNING: Cancer and Reproductive Harm - www.P65Warnings.ca.gov

#### **Product description**

Size: 1.1 Amp

NOCO Genius smart battery chargers are some of the safest and most advanced on the market. One of our best, the G1100 1, 1 Amp is designed to charge 6-volt and 12-volt lead-acid and lithium-ion batteries up to 40Ah. It can also effectively maintain automotive, marine, RV, power sport, lawn & garden and deep-cycle batteries. It charges 2x faster than ordinary battery chargers, can repair damaged batteries and is designed to use with micro-hybrid start-stop vehicles and CANBUS electrical systems. Guided by an onboard microcomputer, the G1100 monitors battery activity for safe and efficient charging, automatically minimizes energy consumption and provides redundant levels of safety protection, including spark-proof technology, as well as reverse polarity and overcharge protection. It can remain safely connected 24/7, while the streamlined design makes it ultra-compact, portable and incredibly lightweight. It features external mounting holes and a rubberized base that avoids surface slipping and scratches, while remaining impact, UV and water-resistant (IP65). Intuitive LED indicators provide visual diagnostic information and feedback of the batteries state-of-charge, even when in maintenance mode. Designed for use on 120-volt 50-60 Hz electrical systems, the G1100 smart charger includes both X-Connect battery clamps with integrated eyelet terminals, as well as a 5-year limited warranty. Other commonly used search terms include: 12 volt battery charger, 12 volt battery maintainer, 12 volt motorcycle trickle charger, 12 volt trickle charger, 12 volt battery auto battery charger, 12v battery charger, 12v battery trickle charger, 12v battery trickle charger, 12v car battery charger, 12v trickle charger, 24 volt battery charger, 24v volt trickle charger, 24v battery charger, 24v battery and charger, 24v battery charger, 12v battery charg 24v battery chargers, 24v trickle charger, atv battery charger, automobile battery charger, automotive battery charger, automotive battery charger, battery charger 12v, battery charger automotive battery charger, automotive battery charger, battery charger 12v, battery charger automotive battery charger, auto battery charger automotive, battery charger car, battery charger for car, battery charger for cars, battery charger portable, battery charger scooter, battery chargers, battery chargers automotive, battery desulfator, battery maintainer, battery maintainer 12 volt, battery tender, battery tender junior, battery tender usb, battery trickle charger, battery trickle charger with float mode, car battery charger, car battery charger and starter, car battery charger maintainer, car battery charger portable, car battery charger with jump start, car battery chargers, car battery chargers 12 volt, car battery maintainer, car battery tender, car battery trickle charger, Harley Davidson trickle charger, lawn mower battery charger, manual battery charger, marine battery charger, marine battery charger, mini car battery charger, motorcycle battery maintainer, motorcycle battery tender, motorcycle trickle charger, noco, noco battery, noco battery charger, noco genius, noco genius chargers, noco genius ultra safe smart battery charger, portable auto battery charger, portable battery charger, portable car battery charger. 12v battery charger, smart battery charger, solar 12v battery charger, solar 12v car battery charger, solar battery charger, solar battery maintainer 12 volt, solar car battery charger, solar car battery charger, solar battery ch solar power 12v battery charger, solar trickle charger, trickle battery, trickle charger for atv, trickle charger for atv, trickle charger for boat battery, trickle charger for car battery, trickle charger for atv, trickl motorcycle, trickle chargers, trickle chargers for 12 volt batteries, waterproof trickle charger

#### From the manufacturer



Charge Fully
Drained Batteries.
+ Maintain All
Battery Sizes.



#### The Genius G1100 is a portable automatic battery charger and maintainer



#### 4 Chargers In One

Charges 6V & 12V lead-acid batteries (including AGM) and 12V Lithium. Repairs desulfated batteries, and charges in cold conditions.



#### Diagnostics

Intuitive visual diagnostic tool for detecting reverse polarity, low-voltage or damaged batteries.



#### Recovery

Applies a high-voltage pulse charge when low-voltage, sulfation or lost capacity is detected.



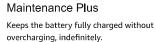
#### **CANbus**

Automatically enables the charging port to charge CANbus systems.



#### Protects against reverse polarity, overcharging, open-circuits, short-circuits, and overheating.







Optimization Stabilizes internal battery chemistry for increased performance and longevity.



Interactive Alters the charging process based on organic battery feedback.



Energy-Save Minimizes energy consumption when full power is not needed.











Model	G750	G1100	G3500	G7200	G15000	G26000
Power	0.75A	1.1A	3.5A	7.2A	15A	26A
Battery Voltage	6V & 12V	6V & 12V	6V & 12V	12V & 24V	12V & 24V	12V & 24V
Cold/AGM Mode		✓	✓	<b>√</b>	✓	✓
12V Lithium Mode		✓	✓	<b>√</b>	✓	✓
Small Battery Mode			✓			
12V Repair Mode			✓	<b>√</b>	<b>√</b>	✓
12V Supply Mode				<b>√</b>	<b>√</b>	✓
12V AGM+				<b>√</b>	✓	✓
JumpCharge Vehicle Starting					✓	✓

7/13



Battery Tender 12 Volt Junior Automatic Battery

Charger

**★★★★** 9,131

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Mroinge MBC016 6V / 12V



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Energizer EN **Battery Charg** + Battery Mai 6/12V - 9 Ste **★★★★☆** \$29.97 **yprin** 

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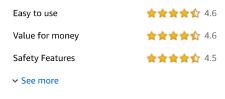
See questions and answers

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#### 4,911 customer reviews



#### By feature



#### By customer groups & interests 💿



#### **Review this product**

Share your thoughts with other customers

Write a customer review

#### **Customer images**



See all customer images

#### Read reviews that mention



#### Showing 1-8 of 4,911 reviews



I had to post this because If I could rate this 0 stars I would. The unit worked great until it died. Yes there is a 5-year warranty but you have to write a check (yes a physical check) to the company to cover the cost of any upgrades made to the product line since your unit was made. Additionally, the warranty process is ridiculous so good luck getting your unit back. It has now been two months and still not had my unit sent back.....

661 people found this helpful





Ad feedback 💭

Amazon.com: NOCO Genius G1100 6V/12V 1.1 Amp Battery Charger and Maintainer: Automotive

Kenneth A. Edelstein

#### \*\*\*\* Resurrection - it IS able to awake a VERY VERY dead battery

April 1, 2017

Size: 3.5 Amp | Verified Purchase

I attached my cheepo float charger to maintain my 74 Honda CB360 battery. OOPS, dummy me forgot to plug in the charger! Three months later not only is the battery dead, also 2 of the cells are BONE dry. I put in distilled water to raise the 12Amp "flooded wet cell" liquid level to midpoint between the lines at the top. I attached a Fluke voltmeter and saw 3 volts, ouch - 50 or so for a new battery. I thought of my G3500 V2 (with "repair") and thought "why not". To my surprise it started to charge - took a mighty long time - about 14 hours on low setting. Next I ran "repair" till a green light (about 4 hours). As there was some "condensed solids" at the bottom of some cells, I made a marathon effort. I alternated between repair and low charge for three days, slowly as the bubbles rose; the solids dissolved and the bottom cleared. I was stunned. Would it start the long sitting cycle, and if so would the charge last at least a week? YES to both!! Frankly, I was 99% on the way to just ordering a new battery. I probably would but for the fact that my ancient 74 bike has a "kick starter". I am delighted with what the G3500 V2 did. A click on "this was helpful" would be appreciated.

1,439 people found this helpful

Helpful | Comment | Report abuse

jhusome

#### ★☆☆☆☆ All was fine, when I looked out to see smoke coming ...

February 4, 2017

Size: 3.5 Amp Verified Purchase

If I had written his review yesterday I would have given it 5 stars. It has worked spectacularly. This said, today I was charing my truck battery. All was fine, when I looked out to see smoke coming out of my hood. The thing was fully on fire! I am so lucky I saw it in time. I could have started a serious fine. I am hoping I can get my money back, but I don't even know what the warranty is.

This thing is dangerous!

573 people found this helpful

Helpful | Comment | Report abuse

Amazon Customer

★☆☆☆☆ not in the same league as CTEK's. it is more a cheap toy than a tool.

February 19, 2018

Size: .75 Amp | Verified Purchase

this is cheaply made. kept showing one battery had a short BUT using a CTEK it charged the battery and all was ok. the NOCO has an intergrated eyelet which is very impractical. the manual is defecient in describing things, confusing. I returned and bought a CTEK which is so far superior, no wonder it is recommended by mercedez, bmw, jaguar and used in jay leno's garage. It has seperate clips and eyelt cords, a carrying case, a nice manual, easier to use and understand, shows exactky what is being done by the charger. the CTEK 'fixed' batteries that the NOCO simply showed an error code, such as battery short. I wiould never buy nor recommend the NOCO. those that gave high reviews must never have used the CTEK. the quality, workmnship, ease of use is truly night and day to the much lesser NOCO. when I tried to contact NOCO for explanation on how to use and whatwas meant in the manual

Amazon.com: NOCO Genius G1100 6V/12V 1.1 Amp Battery Charger and Maintainer: Automotive

(which is a small hard to read single piece of paper, it took a week for a response. then the tech had no idea of the error signals or able to clarify the manual. their warranty seems to me near a sham; you have to pay return fees and the unit is prorated.

100 people found this helpful

Helpful | Comment | Report abuse

Reitus

★☆☆☆☆ One charge is all it would do.

May 11, 2017

Size: 7.2 Amp | Verified Purchase

I purchased the NOCO Genius G7200 from Auto TrenDs in late October 2016. I "repaired" an old battery that was in a work truck that had been sitting for over a year. The battery is still working to this day so the NOCO did the trick. However, when I got the charger out to charge my boat battery the first week in May it didnt work. There was a high pitch sound coming from the NOCO. It wouldn't charge the battery. I got one use out of this \$90 charger. I am attempting to return the unit to the Amazon seller Auto TrenDs, so far they have not responded.

225 people found this helpful



#### ★★☆☆☆ pretty on the outside, not so pretty on the inside.....

February 11, 2017

John S.

Size: 3.5 Amp | Verified Purchase

After 5 years and 2 months of use...maintainng motor cycle (small battery).

I needed to use it on a full sized battery...

I press the mode button and it does nothing, press a few more time and it goes into standy mode and never comes out again.

try to hook to no battery/good battery/bad battery ...no difference. Stuck in Standby mode.

So I dont know when the mode cycling feature failed.

btw, to use warranty you need to pay for shipping, and after 2.5 years 35% of the cost of the product.....

Since I was not going to returnit I opened up the unit and found one of the worst soldering jobs ever.

The outside if the unit is very pretty the inside very poorly soldered .....

I found a cut terminal lead loose/lightly tacked onto motherboard near the mode button.

With the quality of the soldering of this unit, I would not call it ulta-safe.....

328 people found this helpful

Helpful | Comment | Report abuse

★★★☆☆ Will NOT work on a fully discharged battery

January 28, 2017

Jon W

Amazon.com: NOCO Genius G1100 6V/12V 1.1 Amp Battery Charger and Maintainer: Automotive

Size: 7.2 Amp | Verified Purchase

I bought this back in Sept and today is the first occasion I've had to use it. The better half hasn't been driving her Mustang, and as a result the battery went dead. Completely dead. So I unboxed the Genius and hooked it up. Despite numerous attempts, the only light that would come on was the straight power light. I thought I had read something on here about it not working on a fully discharged battery, so I hooked up my Battery Tender and let it work for a few hours. Then there was enough juice in the battery for the Genius to work. It fully charged the battery in about 5 hours. So the description is misleading when it says it will charge a completely dead battery, because it will NOT. So I f this is your only battery charger and you have a fully discharged battery, you're out of luck. Which is not Genius, it's stupid. That's a glaring and unforgivable oversight for a \$100 battery charger. Sometimes the old way is not so bad. If you buy the this battery charger, don't toss your old one. You may need the old low-tech dog to get this high-tech kid going.

163 people found this helpful

Helpful | Comment

Comment | Report abuse

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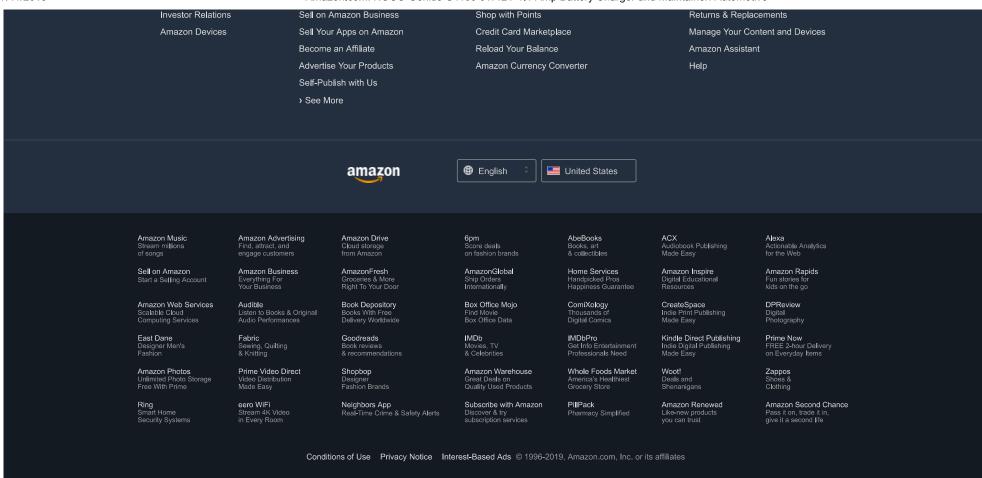
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U.S. District Court
Middle District of Florida

PLAINTIFF'S EXHIBIT

Exhibit Number: PX-057B

Case Number:
6:19-cv-00308-CEM-LRH

Deltona Transformer Corporation
v.

The Noco Company

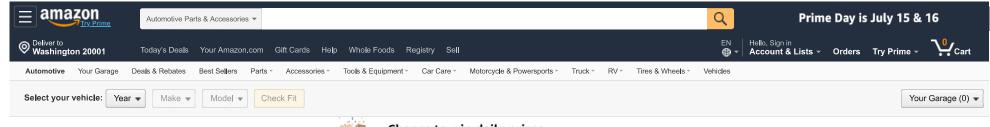
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List Price: \$74.95 Price: \$59.95 & FREE Shipping. Details You Save: \$15.00 (20%) Size: 3.5 Amp .75 Amp 1.1 Amp 3.5 Amp 4-Bank 4.4 Amp \$29.95 \$39.95 \$59.95 \$179.95

7.2 Amp 15 Amp 26 Amp \$98.96 \$159.95 \$199.95

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- Perfect for keeping your vehicles fully-charged and maintained during year-round battery maintenance or long-term storage for improved performance and longevity.
- Works with all types of 6-volt and 12-volt lead-acid batteries, including Wet, Gel, and AGM, or any common automotive, deep-cycle, marine, or maintenance-free battery.
- · Keep your battery fully charged without worry or overcharge. Simply plug-in and let our advanced charging technology automatically monitor and maintain your battery.
- Use our advanced Repair Mode to reverse the damaging effects when batteries are left uncharged for extended periods to improve battery performance and longevity.
- · An optimized charge mode for safely charging and maintaining 12-volt lithium-ion batteries, and recommended with use on lithium batteries with an internal BMS.
- One of the most advanced and safest battery chargers, including spark-proof technology, and reverse polarity protection, plus backed by our 5-year warranty and endless accessories.
- See more product details

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\$129.99 **yprime** 



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**★★★★★ 21** \$89.99 **yrime** 



CTEK 40-206 MXS 5.0-12 Volt Battery Charger **★★★★☆** 83 \$66.05 **yrime** 



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Battery Tender Plus 021-0128, 1.25 Amp Battery Charger is a Smart Charger, it will Fully Charge and Maintain a Battery at Proper Storage Voltage without the Damaging Effects Caused by Trickle Chargers

**★★★★ 4**,933 \$45.03\/prime



NOCO GC002 X-Connect Eyelet Terminal

**★★★☆**1,032



CTEK (56-158) MULTI US 3300 12 Volt Fully Automatic 4 Step Battery Charger

**★★★★☆777** \$47.92<del>/prime</del>



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**This item** NOCO Genius G3500 6V/12V 3.5 Amp Battery Charger and Maintainer



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Battery Tender Plus 021-0128, 1.25 Amp Battery Charger is a Smart Charger, it will Fully Charge and Maintain a Battery at Proper Storage Voltage without the Damaging Effects Caused by Trickle Chargers

\*\*\*\*\*\*\*\*

	Add to Cart	Add to Cart	Add to Cart	Add to Cart
Customer Rating	★★★☆ (4910)	★★★★ (9131)	<b>★★★☆</b> (122)	★★★★ (4933)
Price	\$ <b>59</b> <sup>95</sup>	\$25 <sup>99</sup>	\$ <b>69</b> <sup>75</sup>	\$45 <sup>03</sup>
Shipping	FREE Shipping on orders over \$25			
Sold By	Amazon.com	Amazon.com	Amazon.com	Amazon.com
Item Dimensions	7.7 x 2.7 x 1.9 in	8 x 4 x 9 in	11 x 10 x 8 in	11 x 4 x 11 in

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Q

#### **Product information**

Size:3.5 Amp

Technical Details

Brand	NOCO
Model	G3500

#### Additional Information

ASIN	B004LWVEKS
Customer Reviews	4,910 customer reviews 4.2 out of 5 stars

DTC0002081

#### Amazon.com: NOCO Genius G3500 6V/12V 3.5 Amp Battery Charger and Maintainer: Automotive Best Sellers Rank

Item Weight	2.15 pounds
Product Dimensions	7.7 x 2.7 x 1.9 inches
California residents	Click here for Proposition 65 warning
Item model number	G3500
Batteries	1 Lithium Metal batteries required.
Manufacturer Part Number	G3500
OEM Part Number	BC 90-8162#
ABPA Partslink Number	13
Folding	No
Cover Included	G3500 UltraSafe Battery Charger, Battery Clamps with Integrated Eyelet Terminals, User Guide, 5-Year Limited Warranty
Amperage	3.5 A
Voltage	12 volts

		•		
	Shipping Weight	2.15 pounds (View shipping rates and policies)		
	Date First Available	July 7, 2004		
Warranty & Support				
	Warranty, Parts: Parts			
	Product Warranty: For warranty information about this product, please click here. [PDF ]			

#838 in Automotive (See Top 100 in Automotive)

#158 in Automotive Replacement Parts

#14 in Battery Chargers

Feedback

If you are a seller for this product, would you like to suggest updates through seller support? Would you like to tell us about a lower price?

#### Technical Specification

Specification Sheet [pdf] User Guide [pdf]

#### Product and related videos | Upload your video



Heavy Duty cheap Best 12v car battery charge. Beth P.



Decent charger, easy to use. And lot of options.

#### **Important information**

#### Legal Disclaimer

CALIFORNIA WARNING: Cancer and Reproductive Harm - www.P65Warnings.ca.gov

#### **Product description**

Size:3.5 Amp

NOCO Genius smart battery chargers are some of the safest and most advanced on the market. One of our best, the G3500 3.5 Amp is designed to charge 6-volt and 12-volt lead-acid and lithium-ion batteries up to 120Ah. It can also effectively maintain automotive, marine, RV, power sport, lawn & garden and deep-cycle batteries. It charges 2x faster than ordinary battery chargers, can repair damaged batteries and is designed for use with micro-hybrid start-stop vehicles and CANBUS electrical systems. Guided by an onboard microcomputer, the G3500 monitors battery activity for safe and efficient charging, automatically minimizes energy consumption and provides redundant levels of safety protection, including spark-proof technology, as well as reverse polarity and overcharge protection. It can remain safely connected 24/7, while its streamlined design makes it ultra-compact, portable, and incredibly lightweight. The G3500 features external mounting holes and a rubberized base that avoids surface slipping and scratches, while remaining impact, UV and water-resistant (IP65). Intuitive LED indicators provide visual state-of-charge feedback and diagnostic information, even when in maintenance mode. Designed for use on 120-volt 50-60Hz electrical systems, the G3500 includes both X-Connect battery clamps with integrated eyelet terminals, as well as a 5-year limited warranty. Other commonly used search terms include: 12 volt battery charger, 12 volt battery maintainer, 12 volt motorcycle trickle charger, 12 volt trickle charger, 12 volt at the charger, 12 volt battery charger, 12 volt battery maintainer, 12 volt motorcycle trickle charger, 12 volt battery maintainer, 12 volt motorcycle trickle charger, 12 volt battery maintainer, 12 volt motorcycle trickle charger, 12 volt battery maintainer, 12 volt motorcycle trickle charger, 12 volt battery maintainer, 12 volt motorcycle trickle charger, 12 volt battery maintainer, 12 volt motorcycle trickle charger, 12 volt battery maintainer, 12 volt motorcycle trickle charger, 12 volt battery maintainer, 12 volt motorcycle trickle charger, 12 volt battery maintainer, 12 volt motorcycle trickle charger, 12 volt battery maintainer, 12 volt battery main battery charger, 12v auto battery charger, 12v battery charger, 12v battery charger, 12v battery trickle charger, 12v battery charger, 24v battery charger, chargers, 24v trickle charger, atv battery charger, auto battery charger, automobile battery charger, automotive battery charger, battery charger, battery charger auto, battery charger automotive, battery charger car, battery charger for car, battery charger for cars, battery charger for cars, battery charger portable, battery charger scooter, battery chargers automotive, battery desulfator, battery maintainer, battery maintainer 12 volt, battery tender, battery tender junior, battery tender usb, battery trickle charger, battery trickle charger with float mode, car battery chargers, car battery charger and starter, car battery charger maintainer, car battery charger portable, car battery trickle charger with jump start, car battery chargers, car battery chargers 12 volt, car battery maintainer, car battery trickle charger, Harley Davidson trickle charger, motorcycle battery maintainer, motorcycle battery tender, motorcycle trickle charger, noco battery, noco battery, noco genius, noco genius chargers, noco genius ultra safe smart battery chargers, portable auto battery charger, portable battery charger, portable car battery charger, portal car battery charger, rv solar 12v battery charger, solar 12v battery charger, solar 12v battery charger, solar battery charger, sola solar car battery chargers, solar power 12v battery charger, solar trickle charger, trickle charger, trickle charger for motorcycle, trickle chargers, trickle chargers for 12 volt batteries, waterproof trickle charger

#### From the manufacturer



## Charge Fully Drained Batteries. + Maintain All Battery Sizes.



#### The NOCO Genius G3500 is a portable automatic battery charger and maintainer



#### 7 Chargers In One

Designed for charging starter and deepcycle 12V and 6V lead-acid batteries, including COLD/AGM mode and 12V lithium.



#### Diagnostics

Intuitive visual diagnostic tool for detecting reverse polarity, low-voltage or damaged batteries.



#### Recovery

Applies a high-voltage pulse charge when low-voltage, sulfation or lost capacity is detected.



#### **CANbus**

Automatically enables the charging port to charge CANbus systems.



#### Protects against reverse polarity, overcharging, open-circuits, short-circuits, and overheating.



Maintenance Plus
Keeps the battery fully charged without
overcharging, indefinitely.



Optimization
Stabilizes internal battery chemistry for increased performance and longevity.



Interactive
Alters the charging process based on organic battery feedback.



Energy-Save
Minimizes energy consumption when full power is not needed.



Model	G750	G1100	G3500	G7200	G15000	G26000
Power	0.75A	1.1A	3.5A	7.2A	15A	26A
Battery Voltage	6V & 12V	6V & 12V	6V & 12V	12V & 24V	12V & 24V	12V & 24V
Cold/AGM Mode		✓	✓	✓	✓	✓
12V Lithium Mode		✓	<b>√</b>	<b>√</b>	<b>√</b>	✓
Small Battery Mode			<b>√</b>			
12V Repair Mode			<b>√</b>	✓	✓	✓
12V Supply Mode				<b>√</b>	✓	✓
12V AGM+				<b>√</b>	✓	√
JumpCharge Vehicle Starting					✓	✓

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NOCO Genius GENM3 12 Amp 3-Bank On-Board Battery Charger ★★☆☆ 1,132 \$149.95 √prime



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Peak 20800mAh Portable
Car Jump Starter (8.0L
Gas/6.5L Diesel Eng...
29
\$96.99 \prime



Schumacher SC1304 6/12V Fully Automatic Battery Charger and 3/15A Maintainer





JUMTOP QDSP 3000A Peak 22000mAh Portable Car Jump Starter-UL Certified (10L Gas/8L ... 165 \$129.99 vprime



5.5A Smart Vehicle Battery
Charger Maintainer for
Cars Motorc...
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BEATIT G18 QD! 2000Amp Peak Portable Jump S to 8.0L Gas and 4! \$99.99 \textstyle{prime}

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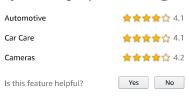
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#### By feature

Easy to use	<b>★★★★☆</b> 4.6
Value for money	<b>★★★★☆</b> 4.6
Safety Features	<b>★★★★☆</b> 4.5
✓ See more	

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I had to post this because If I could rate this 0 stars I would. The unit worked great until it died. Yes there is a 5-year warranty but you have to write a check (yes a physical check) to the company to cover the cost of any upgrades made to the product line since your unit was made. Additionally, the warranty process is ridiculous so good luck getting your unit back. It has now been two months and still not had my unit sent back.....

661 people found this helpful



I attached my cheepo float charger to maintain my 74 Honda CB360 battery. OOPS, dummy me forgot to plug in the charger! Three months later not only is the battery dead, also 2 of the cells are BONE dry. I put in distilled water to raise the 12Amp "flooded wet cell" liquid level to midpoint between the lines at the top. I attached a Fluke voltmeter and saw 3 volts, ouch - 50 or so for a new battery. I thought of my G3500 V2 (with "repair") and thought "why not". To my surprise it started to charge - took a mighty long time - about 14 hours on low setting. Next I ran "repair" till a green light (about 4 hours). As there was some "condensed solids" at the bottom of some cells, I made a marathon effort. I alternated between repair and low charge for three days, slowly as the bubbles rose; the solids dissolved and the bottom cleared. I was stunned. Would it start the long sitting cycle, and if so would the charge last at least a week? YES to both!! Frankly, I was 99% on the way to just ordering a new battery. I probably would but for the fact that my ancient 74 bike has a "kick starter". I am delighted with what the G3500 V2 did. A click on "this was helpful" would be appreciated.

1,439 people found this helpful

Helpful | Comment | Report abuse

ihusome

\*\* All was fine, when I looked out to see smoke coming ...

February 4, 2017

Size: 3.5 Amp | Verified Purchase

If I had written his review yesterday I would have given it 5 stars. It has worked spectacularly. This said, today I was charing my truck battery. All was fine, when I looked out to see smoke coming out of my hood. The thing was fully on fire! I am so lucky I saw it in time. I could have started a serious fine. I am hoping I can get my money back, but I don't even know what the warranty is.

This thing is dangerous!



573 people found this helpful



| Comment | Report abuse



Amazon Customer

\*\* \*\* \*\* not in the same league as CTEK's. it is more a cheap toy than a tool.

February 19, 2018

Size: .75 Amp | Verified Purchase

this is cheaply made. kept showing one battery had a short BUT using a CTEK it charged the battery and all was ok. the NOCO has an intergrated eyelet which is very impractical. the manual is defecient in describing things, confusing. I returned and bought a CTEK which is so far superior, no wonder it is recommended by mercedez, bmw, jaguar and used in jay leno's garage. It has seperate clips and eyelt cords, a carrying case, a nice manual, easier to use and understand, shows exactky what is being done by the charger. the CTEK 'fixed' batteries that the NOCO simply showed an error code, such as battery short. I wiould never buy nor recommend the NOCO. those that gave high reviews must never have used the CTEK. the quality, workmnship, ease of use is truly night and day to the much lesser NOCO. When I tried to contact NOCO for explanation on how to use and whatwas meant in the manual (which is a small hard to read single piece of paper, it took a week for a response. then the tech had no idea of the error signals or able to clarify the manual. their warranty seems to me near a sham; you have to pay return fees and the unit is prorated.

100 people found this helpful



| Comment | Report abuse



Reitus

★☆☆☆☆ One charge is all it would do.

May 11, 2017

Size: 7.2 Amp | Verified Purchase

I purchased the NOCO Genius G7200 from Auto TrenDs in late October 2016. I "repaired" an old battery that was in a work truck that had been sitting for over a year. The battery is still working to this day so the NOCO did the trick. However, when I got the charger out to charge my boat battery the first week in May It didnt work. There was a high pitch sound coming from the NOCO. It wouldn't charge the battery. I got one use out of this \$90 charger. I am attempting to return the unit to the Amazon seller Auto TrenDs, so far they have not responded.

225 people found this helpful



| Comment | Report abuse



John S.

\*\*\* pretty on the outside, not so pretty on the inside.....

February 11, 2017

Size: 3.5 Amp | Verified Purchase

After 5 years and 2 months of use...maintainng motor cycle (small battery).

I needed to use it on a full sized battery...

I press the mode button and it does nothing, press a few more time and it goes into standy mode and never comes

# Amazon.com: NOCO Genius G3500 6V/12V 3.5 Amp Battery Charger and Maintainer: Automotive

out again.

try to hook to no battery/good battery/bad battery ...no difference. Stuck in Standby mode.

So I dont know when the mode cycling feature failed.

btw, to use warranty you need to pay for shipping, and after 2.5 years 35% of the cost of the product.....

Since I was not going to returnit I opened up the unit and found one of the worst soldering jobs ever.

The outside if the unit is very pretty the inside very poorly soldered .....

I found a cut terminal lead loose/lightly tacked onto motherboard near the mode button.

With the quality of the soldering of this unit, I would not call it ulta-safe.....

328 people found this helpful

Helpful

Comment | Report abuse



Jon W

★★★☆☆ Will NOT work on a fully discharged battery

January 28, 2017

Size: 7.2 Amp | Verified Purchase

I bought this back in Sept and today is the first occasion I've had to use it. The better half hasn't been driving her Mustang, and as a result the battery went dead. Completely dead. So I unboxed the Genius and hooked it up. Despite numerous attempts, the only light that would come on was the straight power light. I thought I had read something on here about it not working on a fully discharged battery, so I hooked up my Battery Tender and let it work for a few hours. Then there was enough juice in the battery for the Genius to work. It fully charged the battery in about 5 hours. So the description is misleading when it says it will charge a completely dead battery, because it will NOT. So I f this is your only battery charger and you have a fully discharged battery, you're out of luck. Which is not Genius, it's stupid. That's a glaring and unforgivable oversight for a \$100 battery charger. Sometimes the old way is not so bad. If you buy the this battery charger, don't toss your old one. You may need the old low-tech dog to get this high-tech kid going.

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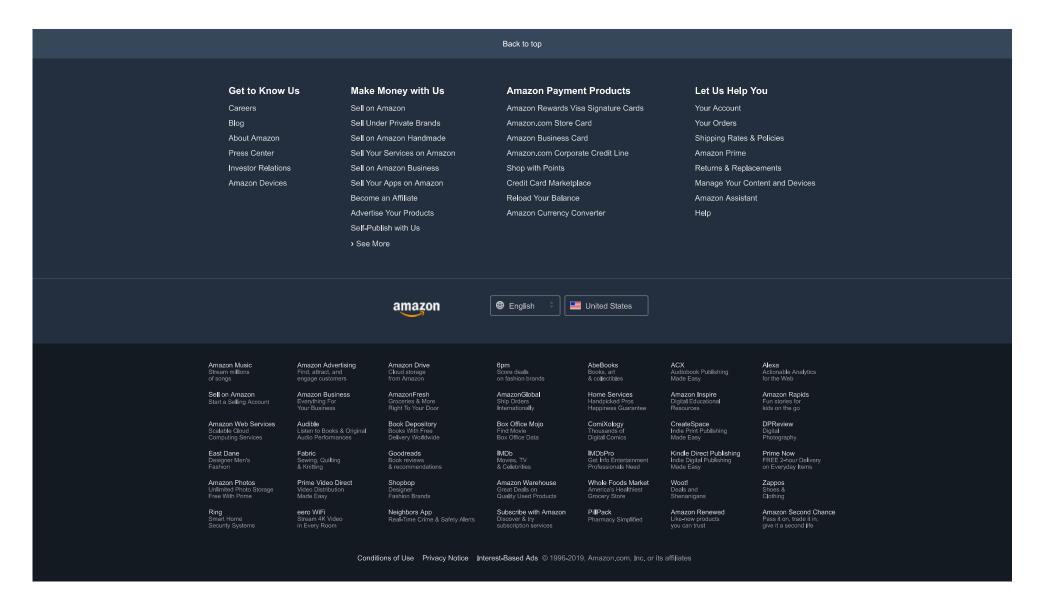


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# **PX-058B**

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U.S. District Court Middle District of Florida

# PLAINTIFF'S EXHIBIT

Exhibit Number: PX-058B

Case Number: 6:19-cv-00308-CEM-LRH Deltona Transformer Corporation

The Noco Company

Date Identified:

Date Admitted:

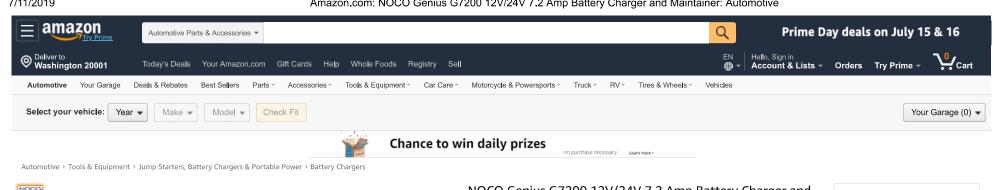
# **PX-059A**

Deltona Transformer Corporation

The Noco Company

Date Identified:

Date Admitted:





# NOCO Genius G7200 12V/24V 7.2 Amp Battery Charger and Maintainer

★★★★☆ ✓ 4,911 customer reviews | 1000+ answered questions Price: \$98.96 & FREE Shipping. Details

Size: 7.2 Amp

by NOCO

.75 Amp 1.1 Amp 3.5 Amp 4-Bank 4.4 Amp \$39.95 \$29.95 \$59.95 \$179.95 7.2 Amp 15 Amp 26 Amp \$159.95 \$199.95 \$98.96

- The most versatile all-in-one battery charger any vehicle owner would need to guickly recharge its battery in hours, including cars, boats, trucks, RVs, tractors and much more up to 230 amp-
- · Perfect for keeping your vehicles fully-charged and maintained during year-round battery maintenance or long-term storage for improved performance and longevity.
- Works with all types of 12-volt and 24-volt lead-acid batteries, including Wet, Gel, and AGM, or any common automotive, deep-cycle, marine, or maintenance-free battery.
- · Keep your battery fully charged without worry or overcharge. Simply plug-in and let our advanced charging technology automatically monitor and maintain your battery.
- Use our advanced Repair Mode to reverse the damaging effects when batteries are left uncharged for extended periods to improve battery performance and longevity. Power Consumption: 132 Watts (Max)
- · Convert the battery charger into a 5-amp constant-current, constant-voltage power supply for maintaining onboard computer member during battery changes or as a DC power source.
- · An optimized charge mode for safely charging and maintaining 12-volt lithium-ion batteries, and recommended with use on lithium batteries with an internal BMS.
- One of the most advanced and safest battery chargers, including spark-proof technology, and reverse polarity protection, plus backed by our 5-year warranty and endless accessories.
- > See more product details

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AmazonBasics Noise Reduction Safety Earmuffs \$11,96

# \$99.95

Add to Cart

& FREE Shipping on eligible orders. Details Sold by: Active Trade

### \$99.95

Add to Cart

& FREE Shipping on eligible orders. Details Sold by: AlphaStereo

Used & new (52) from \$85.63 & FREE shipping. Details

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Ceptics European Travel Adapter Set 2 in 1 USA to Europe, Germany, England... 2,379

\$10.99 yprime

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- ☑ This item: NOCO Genius G7200 12V/24V 7.2 Amp Battery Charger and Maintainer \$98.96
- ₹ LTGEM EVA Hard Case Compatible with NOCO Genius G7200 12V/24V 7.2A UltraSafe Smart Battery Charger... \$16.99
- ✓ NOCO GC004 X-Connect 10-Foot Extension \$13.95

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NOCO Boost Plus GB40 1000 Amp 12V UltraSafe

up to 6L Gasol... **★★★★** 4,280 \$99.00 **yrime** 

Lithium Jump Starter for

QDSP 1500A Peak Portable Lithium Car Jump Starter (up to 8.0L Gas and 6.2L Diesel) ...

**★★★★★** 21 \$89.99 **yrime** 



JUMTOP QDSP 3000A Peak 22000mAh Portable Car Jump Starter-UL Certified (10L Gas/8L ... **★★★★☆** 165

\$129.99 **yrime** 



Volt Battery Charger **★★★★☆** 83 \$66.05 **yrime** 



MICTUNING Level 2 EV Quick Charger (85-265V, 16A, 25FT), LED Display EVSE Electric ... \$189.99 **/prime** 



JUMTOP E18 2000A Peak Portable Car Jump Starter (8.0L Gas/6.5L Diesel Engine) Auto ...

**★★★★★** 34 \$89.99 **yprime** 



Page 1 of 131

**Automatic Battery** Charger Maintaine 1500mA Smart Fl Battery Charger... ★★★☆☆ 17 \$14.99 yprime

Ad feedback 💭

What other items do customers buy after viewing this item?



NOCO GC002 X-Connect Eyelet Terminal **★★★☆** 1,032



CTEK (56-353) MULTI US 7002 12-Volt Battery Charger



NOCO GC004 X-Connect 10-Foot Extension **★★★☆**1,032 \$13.95\prime



Battery Tender Plus 021-0128, 1.25 Amp Battery Charger is a Smart Charger, it will Fully Charge and Maintain a Battery at Proper Storage Voltage without the Damaging Effects Caused by Trickle Chargers

**★★★★1,933** \$45.03\prime

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This item NOCO Genius G7200 12V/24V 7.2 Amp Battery Charger and Maintainer

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**★★★☆☆** (4910)

FREE Shipping on orders over \$25



CTEK (56-353) MULTI US 7002 12-Volt Battery Charger

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\$11196

Amazon.com

7.52 x 3.5 x 1.89 in

★★★★☆ (565)

FREE Shipping on orders over \$25



Battery Tender Plus 021-0128, 1.25 Amp Battery Charger is a Smart Charger, it will Fully Charge and Maintain a Battery at Proper Storage Voltage without the Damaging Effects Caused by Trickle Chargers

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Ampeak 2/8/15A 12V Smart Battery Charger/Maintainer Automatic with Winter Mode

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Size: 7.2 Amp

Price

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**Item Dimensions** 

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# Have a question?

Find answers in product info, Q&As, reviews

Q

# **Product information**

Size:7.2 Amp

# **Technical Details**

Brand	NOCO
Dialiu	NOCO
Model	G7200
Item Weight	1.8 pounds
Product Dimensions	4.3 x 5 inches
California residents	Click here for Proposition 65 warning
Item model number	G7200
Batteries	1 Lithium Metal batteries required. (included)
Manufacturer Part Number	G7200
OEM Part Number	G7200
Folding	No
Cover Included	G7200 Battery Charger and Maintainer, GC001 Battery Clamps w/ Integrated Eyelets, User Guide & Warranty Information
Amperage	7.2 A
Voltage	12 volts

# Technical Specification

User Guide [pdf]
Specification Sheet [pdf]

# Product and related videos (0) Upload your video



# Be the first video

Your name here

# **Important information**

# Additional Information

ASIN	B004LWTHP2
Customer Reviews	★★★★ ◆ 4,911 customer reviews 4.2 out of 5 stars
Best Sellers Rank	#2,340 in Automotive (See Top 100 in Automotive) #24 in Battery Chargers #69 in Automotive Replacement Batteries & Accessories
Shipping Weight	2.85 pounds (View shipping rates and policies)
Domestic Shipping	Currently, item can be shipped only within the U.S. and to APO/FPO addresses. For APO/FPO shipments, please check with the manufacturer regarding warranty and support issues.
International Shipping	This item can be shipped to select countries outside of the U.S. Learn More
Date First Available	July 7, 2004

# Warranty & Support

Warranty, Parts: Parts

Product Warranty: For warranty information about this product, please click here [PDF]

# Feedback

If you are a seller for this product, would you like to suggest updates through seller support? Would you like to tell us about a lower price?

4/12

### Legal Disclaimer

CALIFORNIA WARNING: Cancer and Reproductive Harm - www.P65Warnings.ca.gov

### **Product description**

Size:7,2 Amp

NOCO Genius smart battery chargers are some of the safest and most advanced on the market. One of our best, the G3500 3. 5 Amp is designed to charge 6-volt and 12-volt lead-acid and lithium-ion batteries up to 120Ah. It can also effectively maintain automotive, marine, RV, power sport, lawn & garden and deep-cycle batteries. It charges 2x faster than ordinary battery chargers, can repair damaged batteries and is designed for use with micro-hybrid start-stop vehicles and CANBUS electrical systems. Guided by an onboard microcomputer, the G3500 monitors battery activity for safe and efficient charging, automatically minimizes energy consumption and provides redundant levels of safety protection, including spark-proof technology, as well as reverse polarity and overcharge protection. It can remain safely connected 24/7, while its streamlined design makes it ultra-compact, portable, and incredibly lightweight. The G3500 features external mounting holes and a rubberized base that avoids surface slipping and scratchs, while remaining impact, UV and water-resistant (IP65). Intuitive LED indicators provide visual state-of-charge feedback and diagnostic information, even when in maintenance mode. Designed for use on 120-volt 50-60Hz electrical systems, the G3500 includes both X-Connect battery charger, 12v battery charger, 12v battery charger, 12v but motorcycle trickle charger, 12v battery charger, 24v battery charger, automobile battery charger, automotive battery charger, battery maintainer, battery maintainer 12 volt, battery tender junior, battery tender usb, battery trickle charger, battery trickle charger, ca

# From the manufacturer



2X Faster.

# Charge Fully Drained Batteries. + Maintain All Battery Sizes.



# The Genius G7200 is a portable automatic battery charger



# 8 Chargers In One

Charges 12V & 24V lead-acid batteries (including AGM and more) and 12V Lithium. Repairs desulfated batteries, charges in cold conditions, and has a 13.6V Supply mode.



# Diagnostics

Intuitive visual diagnostic tool for detecting reverse polarity, low-voltage or damaged batteries.



# Recovery

Applies a high-voltage pulse charge when low-voltage, sulfation or lost capacity is detected.



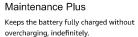
# CANbus

Automatically enables the charging port to charge CANbus systems.



# Protects against reverse polarity, overcharging, open-circuits, short-circuits, and overheating.







Optimization
Stabilizes internal battery chemistry for increased performance and longevity.



Interactive

Alters the charging process based on organic battery feedback.



Energy-Save
Minimizes energy consumption when full power is not needed.



Model	G750	G1100	G3500	G7200	G15000	G26000
Power	0.75A	1.1A	3.5A	7.2A	15A	26A
Battery Voltage	6V & 12V	6V & 12V	6V & 12V	12V & 24V	12V & 24V	12V & 24V
Cold/AGM Mode		<b>√</b>	<b>√</b>	✓	✓	✓
12V Lithium Mode		<b>√</b>	<b>√</b>	<b>√</b>	<b>√</b>	✓
Small Battery Mode			<b>√</b>			
12V Repair Mode			<b>√</b>	<b>√</b>	<b>√</b>	✓
12V Supply Mode				<b>√</b>	<b>√</b>	√
12V AGM+				<b>√</b>	<b>√</b>	✓
JumpCharge Vehicle Starting					✓	✓

# Customers who viewed this item also viewed



NOCO GC002 X-Connect **Eyelet Terminal ★★★★☆** 1,032 38 offers from \$8.25



CTEK (56-353) MULTI US 7002 12-Volt Battery Charger **★★★★☆** 565



\$111.96 **/prime** 



NOCO GC004 X-Connect 10-Foot Extension **★★★☆** 1,032 \$13.95 **/prime** 



LTGEM EVA Hard Case Compatible with NOCO Genius G7200 12V/24V 7.2A UltraSafe Smart... **★★★★☆** 66 \$16.99 **yrime** 



NOCO GC008 X-Connect XL Eyelet Terminal **★★★☆☆** 1,032 \$9.95 **vprime** 



NOCO GC015 X-Connect 12V Eyelet Battery Indicator **★★★☆** 1,032 \$8.99 **/prime** 

Sponsored products related to this item



NOCO Boost Plus GB40 1000 Amp 12V UltraSafe Lithium Jump Starter for up to 6L Gasol... 4,280

\$99.00 **vprime** 



CTEK 40-206 MXS 5.0-12 Volt Battery Charger 83 \$66.05 \prime



JUMTOP QDSP 3000A
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JUMTOP QDSP N12 2500A Peak 20800mAh Portable Car Jump Starter (8.0L Gas/6.5L Diesel...

★★★★☆ 381 \$94.99 **√prime** 



QDSP 1500A Peak Portable Lithium Car Jump Starter (up to 8.0L Gas and 6.2L Diesel) ...

**★★★★** 21 \$89.99 **√prime** 



Ampeak 6V 12V Smart Car Battery Charger and Maintainer 2A 8A Fully Automatic with C... 241 \$49.99 yprime



JUMTOP QDSP 2500A Peak 20800mAh Portable Car Jump Starter (8.0L Gas/6.5L Diesel Eng... 29 \$96.99 \times \text{prime}



BEATIT G18 QD! 2000Amp Peak Portable Jump S to 8.0L Gas and 499.99 \times \text{prime}

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# **Customer Questions & Answers**

See questions and answers

# 4,911 customer reviews

★★★★☆ 4.2 out of 5 stars ∨

5 star	72%
4 star	10%
3 star	4%
2 star	3%
1 star	11%

# **Customer images**











By feature

Safety Features ★★★★★ 4.5

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# By customer groups & interests 🕝

Automotive ★★★☆ 4.1

Car Care ★★★★☆ 4.1

Cameras ★★★☆ 4.2

Is this feature helpful? Yes No

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🛨☆☆☆☆ Stay away — terrible and lengthy warranty process

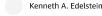
January 5, 2018

Size: 3.5 Amp | Verified Purchase

I had to post this because If I could rate this 0 stars I would. The unit worked great until it died. Yes there is a 5-year warranty but you have to write a check (yes a physical check) to the company to cover the cost of any upgrades made to the product line since your unit was made. Additionally, the warranty process is ridiculous so good luck getting your unit back. It has now been two months and still not had my unit sent back.....

661 people found this helpful





April 1, 2017

Size: 3.5 Amp | Verified Purchase

I attached my cheepo float charger to maintain my 74 Honda CB360 battery. OOPS, dummy me forgot to plug in the charger! Three months later not only is the battery dead, also 2 of the cells are BONE dry. I put in distilled water to raise the 12Amp "flooded wet cell" liquid level to midpoint between the lines at the top. I attached a Fluke voltmeter and saw 3 volts, ouch - 50 or so for a new battery. I thought of my G3500 V2 (with "repair") and thought "why not". To my surprise it started to charge - took a mighty long time - about 14 hours on low setting. Next I ran "repair" till a green light (about 4 hours). As there was some "condensed solids" at the bottom of some cells, I made a marathon effort. I alternated between repair and low charge for three days, slowly as the bubbles rose; the solids dissolved and the bottom cleared. I was stunned. Would it start the long sitting cycle, and if so would the charge last at least a week? YES to both!! Frankly, I was 99% on the way to just ordering a new battery. I probably would but for the fact that my ancient 74 bike has a "kick starter". I am delighted with what the G3500 V2 did. A click on "this was helpful" would be appreciated.

1,439 people found this helpful

Helpful | Comment | Report abuse



★☆☆☆☆ All was fine, when I looked out to see smoke coming ...

February 4, 2017

Size: 3.5 Amp | Verified Purchase

If I had written his review yesterday I would have given it 5 stars. It has worked spectacularly. This said, today I was charing my truck battery. All was fine, when I looked out to see smoke coming out of my hood. The thing was fully on fire! I am so lucky I saw it in time. I could have started a serious fine. I am hoping I can get my money back, but I don't even know what the warranty is.

This thing is dangerous!



573 people found this helpful

Helpful

| Comment | Report abuse



Amazon Customer

★☆☆☆☆ not in the same league as CTEK's. it is more a cheap toy than a tool.

February 19, 2018

Size: .75 Amp | Verified Purchase

this is cheaply made. kept showing one battery had a short BUT using a CTEK it charged the battery and all was ok. the NOCO has an intergrated eyelet which is very impractical, the manual is defecient in describing things, confusing. I returned and bought a CTEK which is so far superior, no wonder it is recommended by mercedez, bmw, jaguar and used in jay leno's garage, it has seperate clips and eyelt cords, a carrying case, a nice manual, easier to use and understand, shows exactky what is being done by the charger. the CTEK 'fixed' batteries that the NOCO simply showed an error code, such as battery short. I wiould never buy nor recommend the NOCO, those that gave high reviews must never have used the CTEK. the quality, workmnship, ease of use is truly night and day to the much lesser NOCO. When I tried to contact NOCO for explanation on how to use and whatwas meant in the manual (which is a small hard to read single piece of paper, it took a week for a response, then the tech had no idea of the error signals or able to clarify the manual, their warranty seems to me near a sham; you have to pay return fees and the unit is prorated.

100 people found this helpful

Helpful

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Reitus

★☆☆☆☆ One charge is all it would do.

May 11, 2017

Size: 7.2 Amp | Verified Purchase

I purchased the NOCO Genius G7200 from Auto TrenDs in late October 2016. I "repaired" an old battery that was in a work truck that had been sitting for over a year. The battery is still working to this day so the NOCO did the trick. However, when I got the charger out to charge my boat battery the first week in May It didnt work. There was a high pitch sound coming from the NOCO. It wouldn't charge the battery. I got one use out of this \$90 charger. I am attempting to return the unit to the Amazon seller Auto TrenDs, so far they have not responded.

225 people found this helpful

Helpful

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John S.

February 11, 2017

Size: 3.5 Amp | Verified Purchase

After 5 years and 2 months of use...maintaining motor cycle (small battery).

I needed to use it on a full sized battery...

I press the mode button and it does nothing, press a few more time and it goes into standy mode and never comes out again.

try to hook to no battery/good battery/bad battery ...no difference. Stuck in Standby mode.

So I dont know when the mode cycling feature failed.

btw, to use warranty you need to pay for shipping, and after 2.5 years 35% of the cost of the product.....

Since I was not going to returnit I opened up the unit and found one of the worst soldering jobs ever.

The outside if the unit is very pretty the inside very poorly soldered .....

I found a cut terminal lead loose/lightly tacked onto motherboard near the mode button.

With the quality of the soldering of this unit, I would not call it ulta-safe.....

328 people found this helpful

Helpful

Comment | Report abuse

Jon W

★★★☆☆ Will NOT work on a fully discharged battery

January 28, 2017

Size: 7.2 Amp | Verified Purchase

I bought this back in Sept and today is the first occasion I've had to use it. The better half hasn't been driving her Mustang, and as a result the battery went dead. Completely dead. So I unboxed the Genius and hooked it up. Despite numerous attempts, the only light that would come on was the straight power light. I thought I had read something on here about it not working on a fully discharged battery, so I hooked up my Battery Tender and let it work for a few hours. Then there was enough juice in the battery for the Genius to work. It fully charged the battery in about 5 hours. So the description is misleading when it says it will charge a completely dead battery, because it will NOT. So I f this is your only battery charger and you have a fully discharged battery, you're out of luck. Which is not Genius, it's stupid. That's a glaring and unforgivable oversight for a \$100 battery charger. Sometimes the old way is not so bad. If you buy the this battery charger, don't toss your old one. You may need the old low-tech dog to get this high-tech kid going.

163 people found this helpful

Helpful

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Millie Meet the dogs of Amazon

U.S. District Court
Middle District of Florida

PLAINTIFF'S EXHIBIT

Exhibit Number: PX-059B

Case Number:
6:19-cv-00308-CEM-LRH

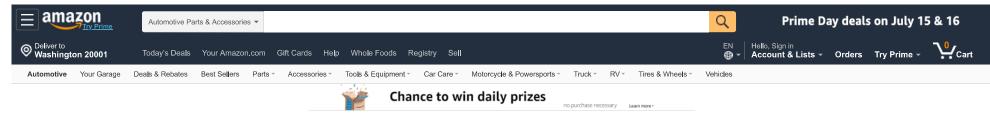
Deltona Transformer Corporation
v.

The Noco Company

Date Identified:

Date Admitted:

# **PX-060A**



Automotive > Tools & Equipment > Jump Starters, Battery Chargers & Portable Power > Battery Chargers







Roll over image to zoom in

# NOCO Genius G15000 12V/24V 15 Amp Pro-Series Battery Charger and Maintainer

by NOCO

★★★★☆ × 4,911 customer reviews | 1000+ answered questions

Price: \$159.95 & FREE Shipping. Details

Get \$50 off instantly: Pay \$159.95 \$109.95 upon approval for the Amazon Rewards Visa Card. No annual fee.

### Size: 15 Amp



- A powerful, professional grade battery charger and battery maintenance tool designed to recharge all types of batteries rapidly in workshops, garages or those you simply want the best.
- Perfect for keeping your vehicles fully-charged and maintained during year-round battery maintenance or long-term storage for improved performance and longevity.
- Works with all types of 12-volt and 24-volt lead-acid batteries, including Wet, Gel, and AGM, or any common automotive, deep-cycle, marine, or maintenance-free battery.
- Keep your battery fully charged without worry or overcharge. Simply plug-in and let our advanced charging technology automatically monitor and maintain your battery. Progressive repair mode for heavily sulfated 12V batteries.
- Use our advanced Repair Mode to reverse the damaging effects when batteries are left uncharged for extended periods to improve battery performance and longevity.
- Convert the battery charger into a 5-amp constant-current, constant-voltage power supply for maintaining onboard computer member during battery changes or as a DC power source.
- An optimized charge mode for safely charging and maintaining 12-volt lithium-ion batteries, and recommended with use on lithium batteries with an internal BMS.
- One of the most advanced and safest battery chargers, including spark-proof technology, and reverse polarity protection, plus backed by our 5-year warranty and endless accessories.
- > See more product details

Compare with similar items

Used & new (41) from \$143.77 & FREE shipping. Details





# Save on AmazonBasics and SupplyMaster Safety Gear











Exam Nitrile Gloves, 400 pk \$24.30 Blocking Safety Glasses, 12pk \$51.41 Reduction Safety Earmuffs \$11.96

# Frequently bought together



Total price: \$191.89

Add all three to Cart

Add all three to List

i These items are shipped from and sold by different sellers. Show details

▼ This item: NOCO Genius G15000 12V/24V 15 Amp Pro-Series Battery Charger and Maintainer \$159.95

✓ LTGEM EVA Hard Case Compatible with NOCO Genius G15000 12V/24V 15A Pro Series UltraSafe Smart... \$17.99

✓ NOCO GC004 X-Connect 10-Foot Extension \$13.95

# Sponsored products related to this item



NOCO Boost Plus GB40 1000 Amp 12V UltraSafe Lithium Jump Starter for up to 6L Gasol... 4,280 \$99.00 \( \text{prime} \)



CTEK 40-206 MXS 5.0-12 Volt Battery Charger \*\*\* \* \* 83 \$66.05 \rightarrow{prime}



NOCO Genius GEN1 10 Amp 1-Bank On-Board Battery Charger 1,132 \$99.95 \ prime



Ampeak 6V 12V Smart Car Battery Charger and Maintainer 2A 8A Fully Automatic with C... 241 \$49.99 \textstyrime



Mroinge 12V 2A Lead
Acid/Lithium(LiFePO4)
Automatic Trickle Battery
Charger Smart B...
82
\$20.99 \text{prime}



BEATIT G18 QDSP 2000Amp Peak 12V Portable Jump Starter (Up to 8.0L Gas and Diesel E... 493 \$99.99 \text{yprime}



Battery Tender Pli 0128, 1.25 Amp B Charger is a Smar Charger, it will ... 4,9: \$45.03 \times prime Have one to sell? Sell on Amazon



Ad feedback 💭

# What other items do customers buy after viewing this item?



CTEK (56-353) MULTI US 7002 12-Volt Battery Charger 565 \$111.96 prime



Schumacher SC1280 6/12V Rapid Battery Charger and 15A Maintainer 207 \$44.97\/prime



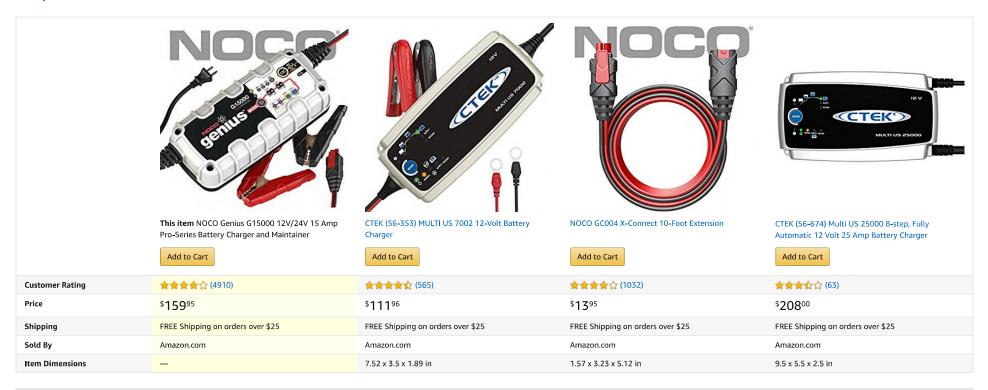
NOCO GC004 X-Connect 10-Foot Extension
1,032
\$13.95\prime



Battery Tender Plus 021-0128, 1.25 Amp Battery Charger is a Smart Charger, it will Fully Charge and Maintain a Battery at Proper Storage Voltage without the Damaging Effects Caused by Trickle Chargers

\$45.03**/prime** 

# Compare with similar items



# Special offers and product promotions

Size: 15 Amp

• No interest if paid in full within 6 months with the Amazon.com Store Card on any purchase totaling \$149 or more. Apply now.

WARNING: California's Proposition 65

# Have a question?

Find answers in product info, O&As, reviews

Q

# **Product information**

Size:15 Amp

Technical Details

Brand	NOCO
Model	G15000
Item Weight	6.5 pounds
Product Dimensions	5.6 x 18 inches

# Additional Information

ASIN	B00PKIBVU0
Customer Reviews	4,911 customer reviews 4.2 out of 5 stars
Best Sellers Rank	#10,594 in Automotive (See Top 100 in Automotive) #65 in Battery Chargers  DTC0002106
	D1C0002106

California residents	Click here for Proposition 65 warning
Item model number	G15000
Manufacturer Part Number	G15000
Folding	No
Cover Included	G15000 UltraSafe Battery Charger, Battery Clamps with Integrated Eyelet Terminals, User Guide, 5-Year Limited Warranty
Amperage	15 A
Voltage	12 volts

<b>T</b> 1				
rec	hnical	Sbe	стпса	ation

Specification Sheet [pdf]
User Manual [pdf]

# Product and related videos (0) Upload your video



### Be the first video

Your name here

# Important information

# Legal Disclaimer

CALIFORNIA WARNING: Cancer and Reproductive Harm - www.P65Warnings.ca.gov

# **Product description**

Size: 15 Amp

NOCO Genius smart battery chargers are some of the safest and most advanced on the market. One of our best, the G15000 15 Amp is designed to charge 12-volt and 24-volt lead-acid and lithium-ion batteries up to 400Ah. It can also effectively maintain automotive, marine, RV, lawn & garden and deep-cycle batteries. It charges 2x faster than ordinary battery chargers, can jump start dead batteries, repair damaged batteries, power DC devices and is designed to use with micro-hybrid start-stop vehicles and CANBUS electrical systems. Guided by an onboard microcomputer, the G15000 monitors battery activity for safe and efficient charging, automatically minimizes energy consumption and provides redundant levels of safety protection, including spark-proof technology, as well as reverse polarity and overcharge protection. It can remain safely connected 24/7, while its streamlined design makes it ultra-compact, portable and incredibly lightweight. The G15000 features external mounting holes and a rubberized base that avoids surface slipping and scratches, all while remaining impact, UV and water-resistant (IP44). Intuitive LED indicators provide visual state-of-charge feedback and diagnostic information, even when in maintenance mode. Designed for use on 120-volt, 50-60Hz electrical systems, the G15000 includes HD X-Connect battery clamps with detachable eyelet terminals and a 5-year limited warranty. Other commonly used search terms include: 12 volt battery charger, 24 volt trickle charger, 24v battery charger, automotive battery chargers, automotive battery chargers, battery charger for car, battery charger for car, battery maintainer 12 volt, battery

## From the manufacturer

	W0 0051 A 4 W D I 4 D 4
	#3,025 in Automotive Replacement Parts
Shipping Weight	6.53 pounds (View shipping rates and policies)
Date First Available	November 13, 2014
Warranty & Support  Warranty, Parts: Parts	
Product Warranty: For warranty information about this product,	please click here. [PDF ]
Feedback	

If you are a seller for this product, would you like to suggest updates through seller support?

Would you like to tell us about a lower price?

DTC0002107



# Charge Fully Drained Batteries. + Maintain All



Rotton, Sizos

The Genius G15000 is a portable automatic battery charger with a JumpCharge engine start feature



# 9 Chargers In One

Charges 12V & 24V lead-acid batteries (including AGM and more) and 12V lithium. Repairs desulfated batteries, charges in cold conditions, and has a 13.6V Supply mode. Also includes JumpCharge (see below) for starting dead batteries.



# Diagnostics

Intuitive visual diagnostic tool for detecting reverse polarity, low-voltage or damaged batteries.



# Recovery

Applies a high-voltage pulse charge when low-voltage, sulfation or lost capacity is detected.



# **CANbus**

Automatically enables the charging port to charge CANbus systems.



# Protects against reverse polarity, overcharging, open-circuits, short-circuits, and overheating.



Maintenance Plus
Keeps the battery fully charged without
overcharging, indefinitely.



Optimization
Stabilizes internal battery chemistry for increased performance and longevity.



Interactive
Alters the charging process based on organic battery feedback.



Energy-Save
Minimizes energy consumption when full power is not needed.



Model	G750	G1100	G3500	G7200	G15000	G26000
Power	0.75A	1.1A	3.5A	7.2A	15A	26A
Battery Voltage	6V & 12V	6V & 12V	6V & 12V	12V & 24V	12V & 24V	12V & 24V
Cold/AGM Mode		✓	✓	✓	✓	✓
12V Lithium Mode		<b>√</b>	<b>√</b>	<b>√</b>	<b>√</b>	✓
Small Battery Mode			<b>√</b>			
12V Repair Mode			<b>√</b>	✓	✓	✓
12V Supply Mode				<b>√</b>	✓	✓
12V AGM+				<b>√</b>	✓	√
JumpCharge Vehicle Starting					✓	√

Customers who viewed this item also viewed

6/11













# Sponsored products related to this item



CTEK 40-206 MXS 5.0-12 Volt Battery Charger **★★★★☆** 83 \$66.05 **/prime** 



**BEATIT G18 QDSP** 2000Amp Peak 12V Portable Jump Starter (Up to 8.0L Gas and Diesel E... **★★★★☆** 493 \$99.99 **vprime** 



Ampeak 6V 12V Smart Car **Battery Charger and** Maintainer 2A 8A Fully Automatic with C... **★★★★☆** 241 \$49.99 **yprime** 



Starter - 2500A Peak 20000mAH (Up to 8L Gas or 8L Diesel ... ★★★★☆ 139 \$99.99 **yprime** 



Schumacher SC1281 6/12V Fully Automatic **Battery Charger and** 30/100A Engine Starter ... **★★★★☆** 122 \$69.75 **yrime** 



Battery Tender 022-0148-DL-WH 12-Volt 4-Bank Battery Management System **★★★★☆** 1,601

\$139.65 **/prime** 



★★★★☆ 12 \$85.68 yprime



**Automatic Battery** Charger/Maintainer for Sealed Lead Acid or Lithi... **★★★★☆** 50 \$20.95 **yrime** 



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GOODTHREADS Crafted with care. From \$25 Shop now

Ad feedback 💭

**Customer Questions & Answers** 

See guestions and answers

# 4,911 customer reviews



# By feature

Easy to use	★★★★☆ 4.
Value for money	★★★★☆ 4.
Safety Features	<b>★★★★☆</b> 4.
→ See more	

# By customer groups & interests 🕝



# Review this product

Share your thoughts with other customers





Ad feedback 🖵

# **Customer images**



See all customer images

# Read reviews that mention



### Showing 1-8 of 4,911 reviews



I had to post this because If I could rate this 0 stars I would. The unit worked great until it died. Yes there is a 5-year warranty but you have to write a check (yes a physical check) to the company to cover the cost of any upgrades made to the product line since your unit was made. Additionally, the warranty process is ridiculous so good luck getting your unit back. It has now been two months and still not had my unit sent back.....

661 people found this helpful



I attached my cheepo float charger to maintain my 74 Honda CB360 battery. OOPS, dummy me forgot to plug in the charger! Three months later not only is the battery dead, also 2 of the cells are BONE dry. I put in distilled water to raise the 12Amp "flooded wet cell" liquid level to midpoint between the lines at the top. I attached a Fluke voltmeter and saw 3 volts, ouch - 50 or so for a new battery. I thought of my G3500 V2 (with "repair") and thought "why not". To my surprise it started to charge - took a mighty long time - about 14 hours on low setting. Next I ran "repair" till a green light (about 4 hours). As there was some "condensed solids" at the bottom of some cells, I made a marathon effort. I alternated between repair and low charge for three days, slowly as the bubbles rose; the solids dissolved and the bottom cleared. I was stunned. Would it start the long sitting cycle, and if so would the charge last at least a week? YES to both!! Frankly, I was 99% on the way to just ordering a new battery. I probably would but for the fact that my ancient 74 bike has a "kick starter". I am delighted with what the G3500 V2 did. A click on "this was helpful" would be appreciated.

1,439 people found this helpful



★☆☆☆☆ All was fine, when I looked out to see smoke coming ...
February 4, 2017

Size: 3.5 Amp | Verified Purchase

If I had written his review yesterday I would have given it 5 stars. It has worked spectacularly. This said, today I was charing my truck battery. All was fine, when I looked out to see smoke coming out of my hood. The thing was fully on fire! I am so lucky I saw it in time. I could have started a serious fine. I am hoping I can get my money back, but I don't even know what the warranty is.

This thing is dangerous!



573 people found this helpful

Helpful

| Comment | Report abuse



Amazon Customer

★☆☆☆☆ not in the same league as CTEK's. it is more a cheap toy than a tool.

February 19, 2018

Size: .75 Amp | Verified Purchase

this is cheaply made. kept showing one battery had a short BUT using a CTEK it charged the battery and all was ok. the NOCO has an intergrated eyelet which is very impractical. the manual is defecient in describing things, confusing. I returned and bought a CTEK which is so far superior, no wonder it is recommended by mercedez, bmw, jaguar and used in jay leno's garage. It has seperate clips and eyelt cords, a carrying case, a nice manual, easier to use and understand, shows exactky what is being done by the charger. the CTEK 'fixed' batteries that the NOCO simply showed an error code, such as battery short. I wiould never buy nor recommend the NOCO. those that gave high reviews must never have used the CTEK. the quality, workmnship, ease of use is truly night and day to the much lesser NOCO. When I tried to contact NOCO for explanation on how to use and whatwas meant in the manual (which is a small hard to read single piece of paper, it took a week for a response. then the tech had no idea of the error signals or able to clarify the manual. their warranty seems to me near a sham; you have to pay return fees and the unit is prorated.

100 people found this helpful



Comment | Report abuse



Reitus

★☆☆☆☆ One charge is all it would do.

May 11, 2017

Size: 7.2 Amp | Verified Purchase

I purchased the NOCO Genius G7200 from Auto TrenDs in late October 2016. I "repaired" an old battery that was in a work truck that had been sitting for over a year. The battery is still working to this day so the NOCO did the trick. However, when i got the charger out to charge my boat battery the first week in May it didnt work. There was a high pitch sound coming from the NOCO. It wouldn't charge the battery. I got one use out of this \$90 charger. I am attempting to return the unit to the Amazon seller Auto TrenDs, so far they have not responded.

225 people found this helpful



| Comment | Report abuse



John S.

\*\*\* pretty on the outside, not so pretty on the inside.....

February 11, 2017

Size: 3.5 Amp | Verified Purchase

After 5 years and 2 months of use...maintaining motor cycle (small battery).

I needed to use it on a full sized battery...

I press the mode button and it does nothing, press a few more time and it goes into standy mode and never comes

# Amazon.com: NOCO Genius G15000 12V/24V 15 Amp Pro-Series Battery Charger and Maintainer: Automotive

out again.

try to hook to no battery/good battery/bad battery ...no difference. Stuck in Standby mode.

So I dont know when the mode cycling feature failed.

btw, to use warranty you need to pay for shipping, and after 2.5 years 35% of the cost of the product.....

Since I was not going to returnit I opened up the unit and found one of the worst soldering jobs ever.

The outside if the unit is very pretty the inside very poorly soldered .....

I found a cut terminal lead loose/lightly tacked onto motherboard near the mode button.

With the quality of the soldering of this unit, I would not call it ulta-safe.....

328 people found this helpful

Helpful

Comment | Report abuse



★★★☆☆ Will NOT work on a fully discharged battery

January 28, 2017

Size: 7.2 Amp | Verified Purchase

I bought this back in Sept and today is the first occasion I've had to use it. The better half hasn't been driving her Mustang, and as a result the battery went dead. Completely dead. So I unboxed the Genius and hooked it up. Despite numerous attempts, the only light that would come on was the straight power light. I thought I had read something on here about it not working on a fully discharged battery, so I hooked up my Battery Tender and let it work for a few hours. Then there was enough juice in the battery for the Genius to work. It fully charged the battery in about 5 hours. So the description is misleading when it says it will charge a completely dead battery, because it will NOT. So I f this is your only battery charger and you have a fully discharged battery, you're out of luck. Which is not Genius, it's stupid. That's a glaring and unforgivable oversight for a \$100 battery charger. Sometimes the old way is not so bad. If you buy the this battery charger, don't toss your old one. You may need the old low-tech dog to get this high-tech kid going.

163 people found this helpful

Helpful

Comment | Report abuse

See all 4,911 reviews >

Write a customer review

Pages with related products. See and discover other items: dc to dc charger, car jumpers, electric parts for campers, Best chargers for battery, safe tool, motorcycle spark plugs

# Set up an Amazon Giveaway

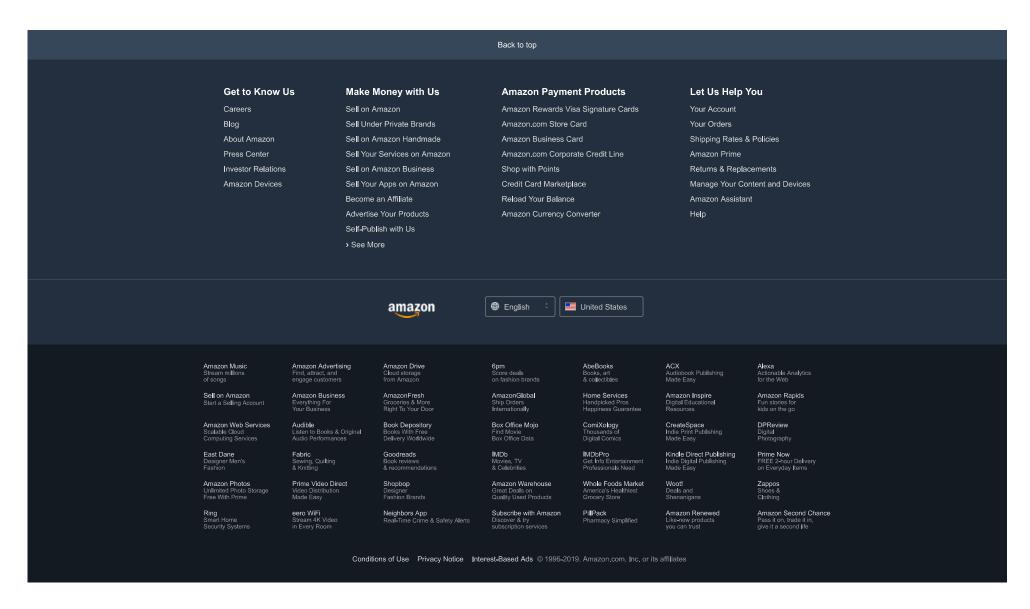


Amazon Giveaway allows you to run promotional giveaways in order to create buzz, reward your audience, and attract new followers and customers. Learn more about Amazon Giveaway

This item: NOCO Genius G15000 12V/24V 15 Amp Pro-Series Battery Charger and Maintainer

Set up a giveaway





# **PX-061A**



July 1, 2015

Akerman LLP 777 South Flagler Drive Suite 1100 West Tower West Palm Beach, FL 33401 Tel: 561.653.5000

Fax: 561.659.6313

Dir: 561.671.3694 Dir Fax: 561.651.1563 patricia.carlson@akerman.com

# Via FedEx

Mr. William K. Nook, Sr. President and CEO The Noco Company 30339 Diamond Parkway #102 Glenwillow, OH 44139-5400

> Re: Misuse of BATTERY TENDER® Mark Our Ref. 10948-14

Dear Mr. Nook:

We are counsel to Deltona Transformer Corporation ("Deltona") of Deland, Florida, the exclusive owner of the BATTERY TENDER® mark (the "Mark") for battery chargers, as well as batteries and battery accessories. Deltona has offered its products under Deltona's Mark for more than 23 years. Deltona advertises its products extensively and is extremely well-known to the consuming public, which has come to associate the BATTERY TENDER® Mark with products of the highest quality. With its long-standing history of association with high quality products, the BATTERY TENDER® Mark has become synonymous with quality and trustworthiness.

Our client has just learned that The Noco Company ("Noco") is inappropriately using the Mark to draw attention and traffic to Noco's battery charger products on Amazon's website. Specifically, Noco is using the Mark, or a variation thereof, as a keyword to trigger Noco's targeted advertising on Amazon's website. A copy of this Amazon website page is enclosed. Although you may believe that keyword triggered advertising on Amazon or other online retailers/search engines does not constitute "use" of a mark, several courts have held that such an advertising program does constitute an actionable use under the Lanham Act, 15 U.S.C. §§ 1114, 1125(a). See e.g., Financial Express, LLC v. Nowcom Corp., 564 F. Supp. 2d 1160, 1173-74 (C.D. Cal. 2008) (the court granted a preliminary injunction to the plaintiffs, enjoining the defendants from purchasing the plaintiff's registered marks as keywords which, upon a search,

akerman.com

U.S. District Court
Middle District of Florida

PLAINTIFF'S EXHIBIT
Exhibit Number: PX-061A

Case Number:
6.19-ev-00308 CEM-LRH
Deltona Transformer Corporation
V.
The Nocg Company
Date Identified:

Date Admitted:

Mr. William K. Nook, Sr. President and CEO The Noco Company July 1, 2015 Page 2

produced defendant's banner advertisements).

The unauthorized use of our client's Mark to trigger Noco's keyword advertisements is in violation of the Lanham Act and is likely to lead to confusion among consumers that your company's products are sponsored by, or otherwise affiliated with, Deltona. In addition, the potential confusion is compounded by the fact that Noco's advertisement contains an intentionally disparaging variation of Deltona's Mark and is not labeled with any of Noco's brands. Significantly, the placement and surrounding context of Noco's unauthorized use of the Mark on Amazon's website means such use cannot be readily identified as an advertisement and instead appears to be just part of the search results. See Financial Express, 564 F. Supp. 2d at 1177. The content of the advertisement provides a misleading impression to consumers as to the features and capabilities of Deltona's battery charger products, constituting unfair competition and false advertising under the Lanham Act, 15 U.S.C. § 1125(a). E.g., Morningware, Inc. v. Heartwater Home Prods., Inc., 673 F. Supp. 2d 630, 638-39 (N.D. Ill. 2009) (claim for product disparagement properly pled where text of advertisement that appeared after a consumer searched for the plaintiff's mark could have led consumers to incorrectly believe plaintiff's products were inferior or fake).

We look forward to your reply within ten (10) days of your receipt of this letter confirming that you will immediately discontinue all use of the BATTERY TENDER® mark and any variation thereof, including in all keyword advertising programs. Deltona prefers to resolve this matter amicably, but will take appropriate action to protect the valuable goodwill in its products.

This letter is written without prejudice to any of our client's rights or remedies, all of which are expressly reserved.

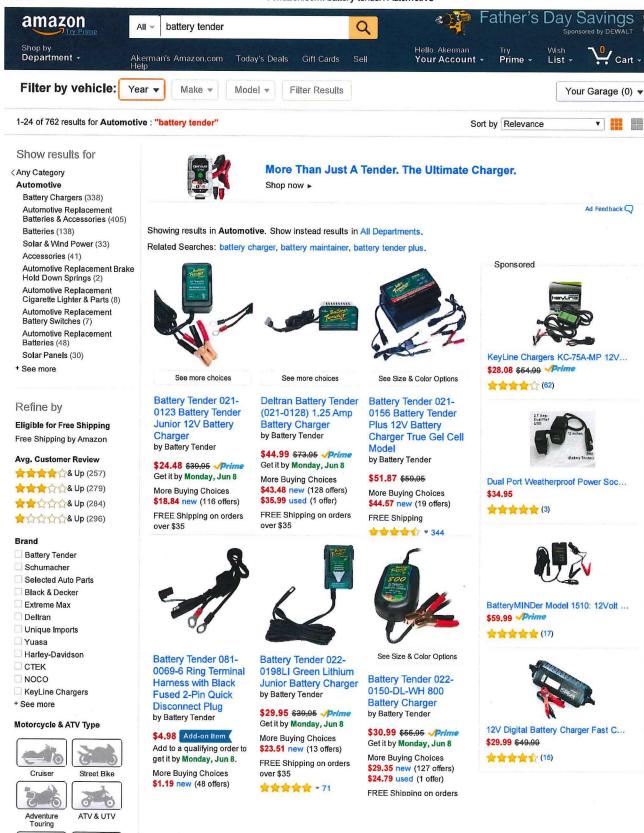
Very truly yours,

AKERMAN LLP

Patricia M. Carlson

Enclosure

cc: Deltona Transformer Corporation (w/encl.)



Dirt Bike

Price
Under \$25 (256)
\$25 to \$50 (240)
\$50 to \$100 (167)
\$100 to \$200 (71)
\$200 & Above (31)

# **PX-061C**



Akerman LLP 777 South Flagler Drive Suite 1100 West Tower West Palm Beach, FL 33401 Tel: 561.653.5000

Fax: 561.659.6313

Dir: 561.671.3694 Dir Fax: 561.651.1563 patricia.carlson@akerman.com

August 13, 2015

Via Email - drp@kjk.com

David R. Posteraro Kohrman Jackson & Krantz One Cleveland Center 1375 East Ninth Street, 29th Floor Cleveland, OH 44114

Re:

Misuse of BATTERY TENDER® Mark

Our Ref. 10948-14

Dear Mr. Posteraro:

It is our understanding that your client has removed the objected-to advertisement from Amazon.com. In light of your client's quick removal of the advertisement, we will consider this matter closed.

Any future reference to my client's Battery Tender<sup>®</sup> branded products in legitimate comparative advertisement should be referenced as such (e.g., "Battery Tender<sup>®</sup> battery chargers"). The Battery Tender<sup>®</sup> trademark should never be mutilated or shortened. Additionally, the trademark should not be used as a noun and should never be used to refer to a category of products. The very isolated handful of improper uses of the trademark by third parties that you identified in your letter in no way lessens my client's trademark rights. My client regularly engages in policing and enforcement of improper trademark uses.

This letter is without prejudice to any of our client's rights or remedies, all of which are expressly reserved.

Sincerely,

AKERMAN LLP

Patricia M. Carlson

cc:

Deltona Transformer Corporation

akerman.com

PLAINTIFF'S EXHIBIT
Exhibit Number: PX-061C
Case Number: 6:19-cv-00308-CEM-LRH
Deltona Transformer Corporation
v.
The Noco Company

U.S. District Court iddle District of Florid

Date Identified:

Date Admitted:

# **PX-061D**



Akerman LLP 777 South Flagler Drive Suite 1100 West Tower West Palm Beach, FL 33401

D: 561 671 3694 T: 561 653 5000 F: 561 659 6313 DirF: 561 651 1563 patricia.flanagan@akerman.com

July 10, 2018

# Via Email and U.S. Mail - drp@kjk.com

David R. Posteraro, Esq. Kohrman Jackson & Krantz One Cleveland Center 1375 East Ninth Street Cleveland, OH 44114

Re:

Use of BATTERY TENDER® Trademark By The Noco Company

Our Ref. 10948-14

Dear Mr. Posteraro:

As you will recall from our prior correspondence and communications, we are counsel to Deltona Transformer Corporation ("Deltona") of Deland, Florida, the exclusive owner of the BATTERY TENDER® mark (the "Mark" or "BATTERY TENDER® Mark") for battery chargers, as well as batteries and battery accessories. In addition to U.S. registrations, the Mark has been independently registered in numerous countries throughout the world. Deltona has offered its products under the Mark for more than 24 years. Deltona advertises its products extensively and is extremely well-known to the consuming public, which has come to associate the BATTERY TENDER® Mark with products of the highest quality. With its long-standing history of association with high quality products, the BATTERY TENDER® Mark has become synonymous with quality and trustworthiness. Our client is dedicated to protecting and preserving its well-known brand and the Mark.

It has recently come to our client's attention that The Noco Company's ("Noco") is using the designation "BATTERY TENDER" in the below advertisement for Noco's battery charger and battery accessories:



SPONSORED BY NOCO
The most advanced battery tender for any vehicle.
Shop now





PLAINTIFF'S EXHIBIT

Exhibit Number: PX-061D

Case Number: 5:19-cv-00308-CEM-LRH Deltona Transformer Corporation

Date Identified:

Date Admitted:



akerman.com

Both federal and state trademark laws protect our client's BATTERY TENDER® Mark from infringement. Noco's unauthorized use of our client's highly valuable Mark is likely to cause confusion or mistake, or to deceive, and constitutes a textbook case of trademark infringement and unfair competition in violation of federal and state laws, including but not limited to §§ 32 and 43(a) of the Lanham Act, 15 U.S.C. § 1114, 1125(a). Noco's conduct has caused, and will continue to cause, significant damage and irreparable harm to Deltona's business reputation and its goodwill in the industry.

Noco's infringement is aggravated by the fact that Noco's recent advertisement now is occurring in spite of Noco's previous unauthorized "comparative advertising" campaign that misused Deltona's BATTERY TENDER® Mark, namely, Noco's use of abbreviated version of the mark to "TENDER" in advertisements. Further, Noco's new advertisement is in breach of the parties' settlement in principal that we reached after extensive communication on behalf of our respective clients following Deltona's objection to Noco's prior use of the Mark in that ad campaign.

More specifically, you will recall that your client was using an advertisement for its battery charger product that stated: "More Than Just A Tender. The Ultimate Charger." Deltona objected to the advertisement, which appeared as nothing short of a bad faith and deliberate attempt to inappropriately draw attention and traffic to Noco's battery charger products using Deltona's goodwill and to harm Deltona and its Mark and brand. In response to Deltona's objection, you represented on behalf of your client Noco that the use of "Tender" in the ad was specifically intended to refer to Deltona's products for purposes of comparative advertising permitted under the Lanham Act. Specifically, in a letter dated July 8, 2015, you stated on behalf of Noco as follows:

[I]t is well settled under case law that the use of a competitor's trademark for purposes of comparative advertising is not trademark infringement. Here, Noco is clearly drawing a comparison to *Deltona's product* in the text of the Advertisement ("More Than A *Tender*") and is not infringing on Deltona's mark by doing so. (emphasis added) (see Letter from Mr. Posteraro to Akerman dated July 8, 2015).

You will recall that we reached an agreement in principal on behalf of our clients. Specifically, that Noco would not use Deltona's Mark, except in "legitimate comparative advertising." In particular, we reached agreement, according to your February 19, 2016 email and its attachment, that legitimate comparative advertising meant complying with the following guidelines:

a. All statements, indications, inferences and/or implications made are, to the best of a party's knowledge, truthful and there are no intentional misrepresentations concerning the nature.

- characteristics, qualities, and/or geographic origin of any goods or services depicted and/or of the commercial activities of any person or entity depicted or referred to, in the advertisement:
- b. The BATTERY TENDER® Mark is solely being used to refer to DTC or DTC's products and/or services;
- c. The BATTERY TENDER® Mark is used in its entirety, together with the ® symbol, and in standard characters;
- d. The BATTERY TENDER® Mark is not mutilated, shortened or otherwise altered;
- e. The BATTERY TENDER® Mark is not used as a noun or to refer to a category of products;
- f. The BATTERY TENDER® Mark is being used solely to inform the public concerning DTC or DTC's products and/or services as compared to NOCO or NOCO's products and/or services; and
- g. The use of the BATTERY TENDER® Mark is not likely to cause confusion, mistake or to deceive as to the affiliation, connection, or association or as to the origin, sponsorship or approval of the goods and/or services promoted in the advertisement.

Despite your March 23, 2016 email agreeing to the above definition, and that I followed up with you on March 24, 2016, March 25, 2016, April 5, 2016 and April 27, 2016, we never heard back from you and the settlement agreement was never signed by the parties. Note that even where parties do not execute a final agreement, however, courts have enforced essential terms of settlement agreements made by counsel on behalf of their respective parties. See, e.g., Jarvis v. City Elec. Supply Co., No. 6:11-cv-1590, 2012 WL 933057, at \*2-3 (M.D. Fla. Mar. 5, 2012) (finding plaintiff reached binding settlement in principle on essential terms through counsel, despite fact that all details were not definitely fixed); Welch v. North American Tank Line, Inc., No. 8:06-CIV-2340, 2008 WL 3982394, at \*1-2 (M.D. Fla. Aug. 25, 2008) (finding parties reached settlement agreement evidenced by e-mail exchanges between counsel containing essential terms, despite that plaintiff later expressed concerns about tax consequences of settlement proceeds). Here, the new advertisement is clearly in breach of the agreed upon terms noted above.

In sum, not only can there be no doubt that Noco's use of the Mark in the above-referenced advertisement is a blatant and deliberate attempt by Noco to divert attention and traffic to Noco's battery charger products and to harm Deltona that gives rise to an actionable likelihood of confusion, but, based upon the above-noted history between the parties, Noco's use of the Mark can be nothing less than deliberate and willful. As such, in the event the parties cannot reach an amicable resolution, Deltona will be seeking treble damages and attorneys' fees.

Noco is expected to comply with the law and cease all infringing activities as of the receipt of this letter. Please contact me by <u>July 16, 2018</u> to confirm that Noco has ceased use of the BATTERY TENDER mark in all advertisements. If I do not hear from you by the time

specified herein, we will assume Noco does not intend to resolve this matter amicably and that Noco insists on willfully violating its intellectual property rights. Under that circumstance, Deltona will have no other option but to file civil action for all appropriate claims and seek an award of all damages available to it under the law, including without limitation, actual damages, your profits, treble damages and attorneys' fees.

This letter is not a complete statement of Deltona's rights in connection with this matter, and nothing contained herein constitutes an express or implied waiver of any rights, remedies, or defenses of Deltona in connection with this matter, all of which are expressly reserved and are not waived.

Sincerely,

AKERMAN LLP

Patricia M. Flanagan

cc:

Deltona Transformer Corporation Thomas L. Raleigh, III, Esq.

# **PX-061F**



Akerman LLP 777 South Flagler Drive Suite 1100 West Tower West Palm Beach, FL 33401

D: 561 671 3694 T: 561 653 5000 F: 561 659 6313 DirF: 561 651 1563

patricia.flanagan@akerman.com

December 12, 2018

Via Email - drp@kjk.com

David R. Posteraro, Esq. Kohrman Jackson & Krantz One Cleveland Center 1375 East Ninth Street Cleveland, OH 44114

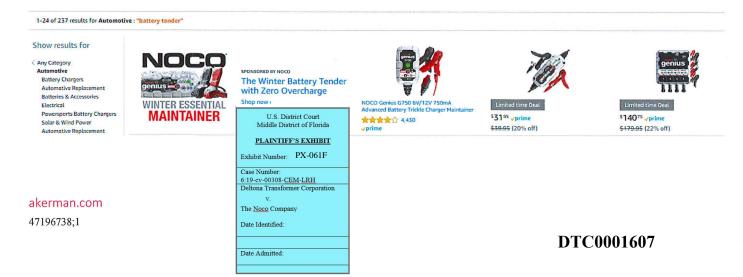
Re: Use of BATTERY TENDER® Trademark By The Noco Company

Our Ref. 10948-14

Mr. Posteraro,

As you are aware, we represent Deltona Transformer Corporation ("Deltona"), the exclusive owner of the BATTERY TENDER® mark (the "Mark" or "BATTERY TENDER® Mark") for battery chargers, as well as batteries and battery accessories. In addition to U.S. registrations, the Mark has been independently registered in numerous countries throughout the world. Deltona has offered its products under the Mark for more than 24 years. Deltona advertises its products extensively and is extremely well-known to the consuming public, which has come to associate the BATTERY TENDER® Mark with products of the highest quality. With its long-standing history of association with high quality products, the BATTERY TENDER® Mark has become synonymous with quality and trustworthiness. Our client is dedicated to protecting and preserving its well-known brand and the Mark.

It has come to our client's attention that The Noco Company ("Noco") is again using the designation "BATTERY TENDER" in the below advertisement appearing on Amazon.com on December 12, 2018, for Noco's battery charger and battery accessories:



Despite our previous extensive and repeated correspondence objecting to similar past infringing usage, Noco still continues to use our client's BATTERY TENDER® Mark in its advertisements. Such conduct is a clear demonstration of a systematic effort to profit from and/or devalue Deltona's intellectual property, in violation of federal and state laws, including but not limited to §§ 32 and 43(a) of the Lanham Act, 15 U.S.C. § 1114, 1125(a). Further, such usage is a direct breach of the parties' settlement in principal, as detailed in our prior July 10, 2018 correspondence to you. The civil remedies available for Noco's violations include immediate and permanent injunctive relief, recovery of Noco's profits, and up to three times the amount of monetary damages suffered by our client, as well as an award of attorney's fees.

Based upon Noco's continuing willfulness, in order to resolve this matter amicably, Deltona demands that Noco immediately and by no later than <u>December 17, 2018</u>:

- 1. Cease and desist from all further use of the BATTERY TENDER® Mark, including placing ads containing the BATTERY TENDER® Mark, or any other designations likely to cause confusion with the BATTERY TENDER® Mark;
- 2. Destroy any materials in its possession or control bearing any designation likely to cause confusion with BATTERY TENDER® Mark;
- 3. Provide sufficient information to demonstrate the clicks and/or click through rate for all of Noco's advertisements containing the BATTERY TENDER® Mark;
- 4. Provide sufficient information to determine the full amount of Noco's gross revenues derived from its use of the BATTERY TENDER® Mark;
- 5. Provide Deltona with written confirmation that Noco has complied with these requested.

Deltona has invested substantial resources into promoting and protecting its intellectual property and will not permit Noco to continue to infringe its rights. If Noco does not provide a satisfactory and timely response to all of the above requests, including providing the requested evidence from which Deltona can calculate its damages and the infringing profits, Deltona is prepared to take all steps necessary to protect Deltona's valuable intellectual property rights without further notice to Noco.

The claims and remedies sought in this letter are not an exhaustive statement of all the relevant facts and law and are without prejudice, and do not constitute a complete statement of Deltona's rights in connection with this matter, and nothing contained herein constitutes an express or implied waiver of any rights, remedies, or defenses of Deltona in connection with this matter, all of which are expressly reserved.

Sincerely,

AKERMAN LLP

Patricia M. Flanagan

cc: Deltona Transformer Corporation

Thomas Raleigh, III, Esq.

# **PX-061G**

# Batteiger, Gabriela M.

From: David R. Posteraro <drp@kjk.com>
Sent: Monday, January 21, 2019 2:32 PM
To: patti.flanagan@akerman.com

Subject: RE: Use of BATTERY TENDER Trademark by The Noco Company; Our Ref. 10948-14

**Attachments:** Petition for Cancellation BATTERY TENDER (K0710849x7AC2A).pdf

#### **SUBJECT TO EVIDENCE RULE 408**

Patti,

In response to your client Deltona Transformer Corporation's ("Deltona") letter of December 12<sup>th</sup> and our subsequent correspondences and conversations, please be advised that we have filed the attached Petition for Cancellation of the Deltona BATTERY TENDER mark (Reg. No. 3474591) on behalf of our client The NOCO Company ("NOCO"). As stated in our Petition, NOCO is being harmed by the continued registration of Deltona's mark which was initially, and we believe always was and is, a generic expression for a type of battery charger.

# David R. Posteraro | Administrative Partner

### **KJK**

1375 East Ninth Street | 29th Floor | Cleveland, Ohio 44114 Direct: 216.736.7218 | Mobile: 216.409.0360 | Email: drp@kjk.com

www.kjk.com

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**From:** patti.flanagan@akerman.com [mailto:patti.flanagan@akerman.com]

Sent: Monday, January 21, 2019 2:10 PM

To: David R. Posteraro

Cc: gabriela.batteiger@akerman.com

Subject: RE: Use of BATTERY TENDER Trademark by The Noco Company; Our Ref. 10948-14

David,

Please let me know when you are available this week to discuss.

My best, Patti

## Patricia M. Flanagan

Partner

Akerman LLP | 777 South Flagler Drive, Suite 1100 West Tower | West Palm Beach, FL 33401

D: 561 671 3694

patricia.flanagan@akerman.com

From: Flanagan, Patti (Ptnr-WPB)

Sent: Wednesday, January 16, 2019 10:30 AM

U.S. District Court
Middle District of Florida

PLAINTIFF'S EXHIBIT

Exhibit Number: PX-061G

Case Number:
6:19-cv-00308-CEM-LRH

Deltona Transformer Corporation
v.

The Noco Company

Date Identified:



To: 'David R. Posteraro' <drp@kjk.com>

Cc: Batteiger, Gabriela (Para-WPB) <gabriela.batteiger@akerman.com>

Subject: RE: Use of BATTERY TENDER Trademark by The Noco Company; Our Ref. 10948-14

David,

I do not see that I have heard back from you. Please let me know your client's position with respect to the below.

My best, Patti

#### Patricia M. Flanagan

Partner

Akerman LLP | 777 South Flagler Drive, Suite 1100 West Tower | West Palm Beach, FL 33401

D: 561 671 3694

patricia.flanagan@akerman.com

From: Flanagan, Patti (Ptnr-WPB)

**Sent:** Monday, January 14, 2019 10:02 AM **To:** 'David R. Posteraro' < drp@kjk.com >

Cc: Batteiger, Gabriela (Para-WPB) <gabriela.batteiger@akerman.com>

Subject: RE: Use of BATTERY TENDER Trademark by The Noco Company; Our Ref. 10948-14

Hi David,

Thank you for discussing this matter last Wednesday with me.

As I noted on our call, my client's BATTERY TENDER® trademark is registered and incontestable in connection with battery chargers. See e.g., U.S. Reg. No. 3474591. In litigation involving an incontestable registration, it is conclusively presumed that the registered mark is valid—i.e., that it is either inherently distinctive or has acquired secondary meaning. See 15 U.S.C.A. § 1115(b) ("To the extent that the right to use the registered mark has become incontestable ... , the registration shall be conclusive evidence of the validity of the registered mark and of the registration of the mark, of the registrant's ownership of the mark, and of the registrant's exclusive right to use the registered mark in commerce."). Thus, a defendant accused of infringing an incontestable registered mark cannot defend itself by claiming that the mark is descriptive and lacks secondary meaning.

I look forward to hearing from you shortly as to whether your client will be providing the requested data and will agree to enter into a formal settlement agreement in order to reach an amicable resolution of this matter.

If you would like to further discuss, I have some time open this afternoon.

My best, Patti

#### Patricia M. Flanagan

Partner

Akerman LLP | 777 South Flagler Drive, Suite 1100 West Tower | West Palm Beach, FL 33401

D: 561 671 3694

patricia.flanagan@akerman.com

From: David R. Posteraro < drp@kjk.com > Sent: Tuesday, January 8, 2019 5:44 PM

To: Flanagan, Patti (Ptnr-WPB) < <a href="mailto:patti.flanagan@akerman.com">patti.flanagan@akerman.com</a>>

Cc: Batteiger, Gabriela (Para-WPB) < gabriela.batteiger@akerman.com >

Subject: RE: Use of BATTERY TENDER Trademark by The Noco Company; Our Ref. 10948-14

How is three tomorrow?

From: patti.flanagan@akerman.com [mailto:patti.flanagan@akerman.com]

**Sent:** Tuesday, January 08, 2019 5:43 PM

To: David R. Posteraro

Cc: gabriela.batteiger@akerman.com

Subject: RE: Use of BATTERY TENDER Trademark by The Noco Company; Our Ref. 10948-14

David,

Please let me know when you are available to talk tomorrow. Thank you.

My best, Patti

#### Patricia M. Flanagan

Partner

Akerman LLP | 777 South Flagler Drive, Suite 1100 West Tower | West Palm Beach, FL 33401

D: 561 671 3694

patricia.flanagan@akerman.com

From: Flanagan, Patti (Ptnr-WPB)

Sent: Monday, January 7, 2019 1:41 PM

To: 'David R. Posteraro' <drp@kjk.com>

Cc: Batteiger, Gabriela (Para-WPB) < gabriela.batteiger@akerman.com >

Subject: RE: Use of BATTERY TENDER Trademark by The Noco Company; Our Ref. 10948-14

David, I am not available tomorrow, but, can do Wednesday. Will that work for you?

#### Patricia M. Flanagan

Partner

Akerman LLP | 777 South Flagler Drive, Suite 1100 West Tower | West Palm Beach, FL 33401

D: 561 671 3694

patricia.flanagan@akerman.com

From: David R. Posteraro < <a href="mailto:drp@kjk.com">drp@kjk.com</a> Sent: Monday, January 7, 2019 12:45 PM

To: Flanagan, Patti (Ptnr-WPB) < <a href="mailto:patti.flanagan@akerman.com">patti.flanagan@akerman.com</a>>

Cc: Batteiger, Gabriela (Para-WPB) <gabriela.batteiger@akerman.com>

Subject: Re: Use of BATTERY TENDER Trademark by The Noco Company; Our Ref. 10948-14

Can we reschedule for tomorrow?

On Jan 4, 2019, at 9:53 AM, David R. Posteraro < <a href="mailto:drp@kjk.com">drp@kjk.com</a>> wrote:

Hello Patti,

Just back. Is there a time early next week that is convenient? I am out Monday morning but should be available in the afternoon or on Tuesday.

**From:** patti.flanagan@akerman.com [mailto:patti.flanagan@akerman.com]

**Sent:** Thursday, January 03, 2019 11:34 AM

To: David R. Posteraro

Cc: gabriela.batteiger@akerman.com

Subject: RE: Use of BATTERY TENDER Trademark by The Noco Company; Our Ref. 10948-14

Hi David,

Please let me know your availability for a call.

My best, Patti

## Patricia M. Flanagan

Partnei

Akerman LLP | 777 South Flagler Drive, Suite 1100 West Tower | West Palm Beach, FL 33401

D: 561 671 3694

patricia.flanagan@akerman.com

From: David R. Posteraro < drp@kjk.com > Sent: Friday, December 21, 2018 5:52 PM

To: Flanagan, Patti (Ptnr-WPB) < <a href="mailto:patti.flanagan@akerman.com">patti.flanagan@akerman.com</a>>

Cc: Batteiger, Gabriela (Para-WPB) < gabriela.batteiger@akerman.com >

Subject: RE: Use of BATTERY TENDER Trademark by The Noco Company; Our Ref. 10948-14

Hi Patti,

Sorry I didn't get back to you sooner. I am out until the 3rd. Will that work for you? If not, perhaps we can find a time sooner.

Regards,

**From:** patti.flanagan@akerman.com [mailto:patti.flanagan@akerman.com]

Sent: Thursday, December 20, 2018 9:19 AM

To: David R. Posteraro

Cc: gabriela.batteiger@akerman.com

Subject: RE: Use of BATTERY TENDER Trademark by The Noco Company; Our Ref. 10948-14

Hi David,

I'd like to set up a time for us to discuss this matter. Please let me know your availability. Thank you.

My best, Patti

#### Patricia M. Flanagan

Partner

Akerman LLP | 777 South Flagler Drive, Suite 1100 West Tower | West Palm Beach, FL 33401

D: 561 671 3694

patricia.flanagan@akerman.com

From: David R. Posteraro < <a href="mailto:drp@kjk.com">drp@kjk.com</a>>
Sent: Wednesday, December 19, 2018 3:43 PM

To: Flanagan, Patti (Ptnr-WPB) < <a href="mailto:patti.flanagan@akerman.com">patti.flanagan@akerman.com</a>>

Cc: Batteiger, Gabriela (Para-WPB) < gabriela.batteiger@akerman.com >

Subject: RE: Use of BATTERY TENDER Trademark by The Noco Company; Our Ref. 10948-14

#### **SUBJECT TO EVIDENCE RULE 408**

Dear Ms. Flanagan,

Please be advised that the advertisement complained of in your letter of 12.12.2018 has been removed as timely requested in your letter. This action was taken to avoid unnecessary legal expenses, is not an admission of liability, nor agreement with the points raised in your letter, and is without prejudice to our client's legal and equitable rights all of which are expressly reserved.

# **David R. Posteraro | Administrative Partner**

## **KJK**

1375 East Ninth Street | 29th Floor| Cleveland, Ohio 44114 Direct: 216.736.7218 | Mobile: 216.409.0360 | Email: drp@kjk.com

www.kjk.com

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**From:** gabriela.batteiger@akerman.com [mailto:gabriela.batteiger@akerman.com]

Sent: Wednesday, December 12, 2018 1:32 PM

To: David R. Posteraro

Cc: patti.flanagan@akerman.com

Subject: Use of BATTERY TENDER Trademark by The Noco Company; Our Ref. 10948-14

Dear Mr. Posteraro,

The attached is sent on behalf of Patricia Flanagan.

Sincerely,

#### **Gabriela Batteiger**

Paralegal

Akerman LLP | 777 South Flagler Drive, Suite 1100 West Tower | West Palm Beach, FL 33401

D: 561 273 5559

gabriela.batteiger@akerman.com

# **CERTIFICATE OF SERVICE**

I hereby certify that on March 19, 2025, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the Court's Appellate PACER system, which will automatically send a notice of electronic filing to all counsel of record.

I further certify that on March 19, 2025, I caused a copy of the Non-Confidential version of the foregoing Appendix to be electronically served on all counsel of record.

I further certify that on March 19, 2025, two copies of the Non-Confidential version of the foregoing were dispatched via third-party commercial carrier to the following:

David J. Smith, Clerk of Court U.S. Court of Appeals for the Eleventh Circuit 56 Forsyth Street, NW Atlanta, GA 30303

Respectfully submitted,

/s/ Gregory A. Castanias

Counsel for Defendant-Appellant